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THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

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CARMEN RILEY,	:
Administrator of the	:
Estate of Ty'rique	:
Riley, et al	: CIVIL ACTION NO.
	: 4:20-CV-00325
vs.	:
	:
BRIAN CLARK, Warden of	:
Dauphin County Prison,	:
et al	:

- - -

Zoom deposition of CORPORAL
CHRISTOPHER HAINES, taken pursuant to notice,
beginning at 10:10 A.M., on Wednesday, February 9,
2022, before Nicholas DiPiero, Registered Professional
Reporter and Notary Public.

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CORP. CHRISTOPHER HAINES

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3 (Pages 6 to 9)

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<p>1 on the same page, I'm just going to go over some of 2 the rules of today's deposition. And if at any time 3 you don't understand anything I'm saying just let me 4 know and I'll try and repeat it. But this is merely a 5 question and answer session.</p> <p>6 The Rules of Civil Procedure allow 7 me as the counsel for the plaintiffs to ask you some 8 questions and get some information about the case. 9 I'm really just asking questions in order to gain your 10 knowledge of specific subject matters. It's not a kind 11 of got you game or anything like that. I'm simply 12 asking questions and asking that you answer them to 13 the best of your ability, okay.</p> <p>14 A. Yes, sir.</p> <p>15 Q. And like I said, I'm looking for your 16 recollection to the best of your ability. I'm not 17 expecting you to guess or to estimate unless I 18 specifically ask you to estimate something or to guess 19 or to speculate. But I'm really just asking to the 20 best of your ability for the things that you can 21 recall.</p> <p>22 And if at any point you are 23 approximating such as the time or the date just let me 24 know that that is an approximation and maybe not the 25 exact in that's the case, okay?</p>	<p>1 A. Yes.</p> <p>2 Q. We can take a break at any time if you need 3 to use the restroom, if you need to consult with your 4 attorney we can do that. That's fine I would only ask 5 that if there's a question that's been asked that you 6 answer it first before we take a break, okay?</p> <p>7 A. Understood.</p> <p>8 Q. Do you understand all of those rules that we 9 just discussed?</p> <p>10 A. Yes, I do.</p> <p>11 Q. Have you taken any medication in the last 24 12 hours that would impact your ability to sit for this 13 deposition today?</p> <p>14 A. No, I haven't.</p> <p>15 Q. Have you consumed any alcohol in the past 24 16 hours?</p> <p>17 A. No.</p> <p>18 Q. And have you taken any medication or anything 19 in the past 24 hours that will impact your ability to 20 recall details from the past?</p> <p>21 A. No.</p> <p>22 Q. Do you have any current medical or physical 23 conditions that would interfere with your ability to 24 sit for today's deposition?</p> <p>25 A. No.</p>
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<p>1 A. Yes, sir.</p> <p>2 Q. And just like you're doing because we have a 3 court reporter here that's taking down everything 4 that's being said. Your answers do need to be verbal 5 just like you've been doing. Even though we can see 6 one another shaking or nodding your head is not going 7 to be enough for the court reporter to record 8 everything so I ask that you respond verbally each 9 time you want to respond, okay?</p> <p>10 A. I understand.</p> <p>11 Q. I will do my best to ask the questions but if 12 it's not clear just simply let me know and I do my 13 best to repeat it so that it is clear. But if you do 14 give an answer I'm going to assume that you understood 15 my question; is street that fair?</p> <p>16 A. That is.</p> <p>17 Q. And again, because we have a court reporter 18 who's trying to take down everything that we say it's 19 important that we not talk over each other. So I'm 20 going to do my best to allow you to complete your 21 answer before I begin with another question. And I 22 ask that you allow me to get out my question 23 completely even if you know exactly what the question 24 is, let me get it out completely before you answer, 25 okay?</p>	<p>1 Q. And do you have any medical or mental or any 2 type of conditions that will affect your ability to 3 recall information from the past?</p> <p>4 A. No, I do not.</p> <p>5 Q. Do you understand that the oath that you took 6 a few minutes ago is the same oath that you would have 7 taken if we were sitting in a courtroom before a Judge 8 and a jury?</p> <p>9 A. Yes, I do.</p> <p>10 Q. And is there any reason that you're not 11 prepared to go forward with today's deposition?</p> <p>12 A. No, I'm prepared.</p> <p>13 Q. Have you reviewed any documents or any 14 materials in preparation for today's deposition?</p> <p>15 A. Yes, I have.</p> <p>16 Q. What have you reviewed?</p> <p>17 A. My reports and also the videos.</p> <p>18 Q. When you say the videos what are you 19 referring to?</p> <p>20 A. The dash-cam from my patrol car that day and 21 also the video of when I was at the prison.</p> <p>22 Q. And when you say that day my belief is that 23 the date that you're referring to is June 18, 2019; is 24 that correct?</p> <p>25 A. I believe that is correct.</p>

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4 (Pages 10 to 13)

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<p>1 Q. Are there any other documents or material 2 that you reviewed in preparation for your deposition 3 today?</p> <p>4 A. No. There's not.</p> <p>5 Q. And you do realize that you are named as a 6 defendant in this lawsuit; is that right?</p> <p>7 A. I do. Yes.</p> <p>8 Q. Have you turned over any documents or 9 materials in connection with this lawsuit?</p> <p>10 MR. MacMAIN: Other than the reports 11 that were provided?</p> <p>12 MR. ROSS: Well, I don't know if he 13 turned them over so I'm asking if he's turned over 14 anything.</p> <p>15 Q. I'm asking, have you produced yourself any 16 documents or materials in connection with this 17 lawsuit? Have you given it to anyone?</p> <p>18 A. No. The only thing that was turned over was 19 my report. That's the only thing that's been produced.</p> <p>20 Q. And I'm going to ask you some more questions 21 about that report when we get to it but I want to 22 start by just getting some background information.</p> <p>23 Again, can you state for the record 24 your full name.</p> <p>25 A. Sure. My first name is Christopher and my</p>	<p>1 any degree or anything.</p> <p>2 Q. Was this before or after you attended 3 Harrisburg Community College?</p> <p>4 A. That was after.</p> <p>5 Q. Do you have any other degrees other than the 6 associate degree?</p> <p>7 A. No, I do not.</p> <p>8 Q. What town do you currently live in?</p> <p>9 MR. MacMAIN: Objection. I don't let 10 officers answer personal questions where they live. If 11 you need to reach him obviously the police station or 12 through me.</p> <p>13 MR. ROSS: So he can't tell me if he 14 lives in Harrisburg?</p> <p>15 MR. MacMAIN: No.</p> <p>16 Q. At the time of -- you can object but I'm 17 going to ask. At the time of -- I'm going to refer to 18 the date of the incident that we just talked about 19 June 18, 2019. Throughout the deposition I'm just 20 going to refer to that as the date of incident. Do you 21 understand that, Corporal Haines?</p> <p>22 A. Yes, sir.</p> <p>23 Q. So the date of the incident how were you 24 employed?</p> <p>25 A. I was employed as a police officer for</p>
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<p>1 last name is Haines, it's H-A-I-N-E-S.</p> <p>2 Q. And what's your date of birth?</p> <p>3 A. It is August 2nd of 1975.</p> <p>4 Q. And where did you graduate from high school?</p> <p>5 A. That was Bible Baptist High School, that's 6 located in Shiretown, Pennsylvania.</p> <p>7 Q. What's the name of town?</p> <p>8 A. Shiretown, it's S-H-I-R-E-T-O-W-N.</p> <p>9 Q. Did you attend college?</p> <p>10 A. I did.</p> <p>11 Q. Where did you go college?</p> <p>12 A. I went to Harrisburg Area(Community College.</p> <p>13 Q. Did you receive a degree there?</p> <p>14 A. Yes.</p> <p>15 Q. What was your degree and what year did you 16 receive it?</p> <p>17 A. It was an associates in criminal justice 18 1996.</p> <p>19 Q. And I'm sorry. What year did you graduate 20 from high school?</p> <p>21 A. 1994.</p> <p>22 Q. Have you received any other, did you attend 23 any other colleges?</p> <p>24 A. I attended a couple courses through Messiah 25 College when I was employed there but I did not get</p>	<p>1 Susquehanna Township.</p> <p>2 Q. And at that time were you a resident of 3 Susquehanna Township?</p> <p>4 MR. MacMAIN: Same objection.</p> <p>5 Q. Have you ever been arrested?</p> <p>6 A. No.</p> <p>7 Q. Have you ever, other than this lawsuit have 8 you ever been a party to a lawsuit?</p> <p>9 A. No.</p> <p>10 Q. You mentioned that you had taken a deposition 11 in the past ten years. What was that in reference to?</p> <p>12 A. Sure. One of my duties for the Susquehanna 13 Township Police Department is I'm part of the Dauphin 14 County Accident Reconstruction Team. I investigated an 15 accident where a Pembroke Borough police car was 16 involved in hitting another vehicle on the street. So 17 I was the investigating officer. So I was more or less 18 a witness and that's how I was deposed.</p> <p>19 Q. Was that a personal injury lawsuit?</p> <p>20 A. Yes.</p> <p>21 Q. Do you know if you were a witness for the 22 plaintiff or the defendant?</p> <p>23 A. I'm sorry. I think both.</p> <p>24 Q. Any other depositions that you sat for?</p> <p>25 A. No.</p>

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5 (Pages 14 to 17)

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<p>1 Q. And were you ever a witness in any other 2 lawsuits?</p> <p>3 A. No.</p> <p>4 Q. I think you may have said this, but what is 5 your current occupation?</p> <p>6 A. I'm a police officer.</p> <p>7 Q. And for what department?</p> <p>8 A. Susquehanna Township.</p> <p>9 Q. How long have you been a police officer for 10 Susquehanna Township?</p> <p>11 A. 21 years.</p> <p>12 Q. Do you remember the year that you began or 13 the date that you began?</p> <p>14 A. It was late October 2021.</p> <p>15 Q. I'm sorry. I think you said 2021. Did you 16 mean 2000?</p> <p>17 A. I'm sorry. It was 2001.</p> <p>18 Q. I may have heard you wrong.</p> <p>19 A. Let me rewind. It was 2001.</p> <p>20 Q. And did you attend a Police Academy before 21 joining the Susquehanna Police Department?</p> <p>22 A. Yes, I did.</p> <p>23 Q. What Police Academy did you attend?</p> <p>24 A. It was the Harrisburg Area Community College 25 Police Academy. I was in the 75th class.</p>	<p>1 I wanted to become a police officer.</p> <p>2 Q. You obtained your associates degree in 1996 3 and began as a public safety officer in 1997. Did you 4 hold any jobs in between those two times?</p> <p>5 A. I was a community service officer pretty much 6 from I'm going to say 1994 the whole way up to when I 7 got hired up at Messiah College and that was for Lower 8 Allen Township Police in Camp Hill, Pennsylvania.</p> <p>9 Q. And did you begin that position before or 10 after your high school graduation?</p> <p>11 A. That would have been after.</p> <p>12 Q. And what were your duties as a community 13 service officer with the Lower Allen Town Township 14 Police Department?</p> <p>15 A. So we didn't have any arrest powers or 16 anything. We would assist the police officers in any 17 way they would need us. Whether it was directing 18 traffic at an accident scene, handling dog calls, 19 anything that you would not need an officer with 20 arrest powers that can handle is what the community 21 service officer does.</p> <p>22 Q. Was this a volunteer position or a paid 23 position?</p> <p>24 A. It was a paid position. It was paid but I'll 25 say it was kind of like a paid internship.</p>
Page 15	Page 17
<p>1 Q. That Police Academy did you attend that in 2 connection with obtaining your associates degree?</p> <p>3 A. That was completely separate.</p> <p>4 Q. What year did you graduate from the Academy?</p> <p>5 A. I believe it was early, late '99 early 2000.</p> <p>6 Q. What year did you start?</p> <p>7 A. It was a six month academy. When did I start 8 the academy; is that what your asking?</p> <p>9 Q. Yes.</p> <p>10 A. I believe the fall of '99.</p> <p>11 Q. At the time that you joined the Academy in 12 the fall of 1999 were you employed?</p> <p>13 A. I was in a leave of absence from Messiah 14 College when I was in the Police Academy.</p> <p>15 Q. What did you do at Messiah College before 16 that leave of absence?</p> <p>17 A. The title was public safety officer.</p> <p>18 Q. And when did you hold that position of public 19 safety officer, what were the dates?</p> <p>20 A. Again, I'm going to have to estimate, I'm 21 going to have to guess. I'm going to say late 1997 to 22 early 2000.</p> <p>23 Q. And what was the reason for your leave of 24 absence?</p> <p>25 A. Because the Police Academy was full-time and</p>	<p>1 Q. Was it full-time?</p> <p>2 A. No.</p> <p>3 Q. And that position the community service 4 officer you said you held from '94 to '97 was that at 5 the same location with the Lower Allen Town Ship?</p> <p>6 A. That is correct.</p> <p>7 Q. Were you ever subject to any type of 8 discipline when you were a community service officer 9 with the lower Allen Town Township Police Department?</p> <p>10 A. No, sir.</p> <p>11 Q. Did you ever receive any complaints filed 12 against you during that time?</p> <p>13 A. No.</p> <p>14 Q. And after that you went to Messiah College as 15 a public safety officer; is that correct?</p> <p>16 A. That is correct.</p> <p>17 Q. And what were your duties as a public safety 18 officer?</p> <p>19 A. To make it general, we were general campus 20 security is what we did, 24/7.</p> <p>21 Q. Did you carry a firearm?</p> <p>22 A. We did not.</p> <p>23 Q. And I should have asked this. But as a 24 community service officer did you carry a firearm?</p> <p>25 A. No.</p>

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6 (Pages 18 to 21)

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1 Q. And back to Messiah College as a public
2 safety officer did you have any arrest powers?
3 A. **No, I did not.**
4 Q. Were you ever ever subject to any discipline
5 as a public safety officer?
6 A. **No.**
7 Q. Did you ever receive any complaints against
8 you?
9 A. **No.**
10 Q. That you're aware of?
11 A. **No.**
12 Q. And then you took a leave of absence from
13 Messiah College to joint the Police Academy, correct?
14 A. **That is correct.**
15 Q. And you graduated in '99 or 2000; is that
16 correct?
17 A. **That is correct.**
18 Q. What did you, what if anything did you do for
19 employment after you graduated from the Police
20 Academy?
21 A. **After I graduated the Police Academy I went
back to Messiah for a month or two at the most and
then I was hired as a police officer for Manor
Township in Lancaster County.**
25 Q. Do you remember the date that you were hired

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1 **Susquehanna Township was closer to where I grew up so
that's why I switched jobs.**
3 Q. Are there any other jobs that you held in any
4 type of law enforcement capacity or community safety
5 capacity that we have not discussed?
6 A. **The one thing we didn't discuss was I am a
veteran so from July 1994 the whole way up to July of
2000 I was in the reserves for the United States
Marine Corp. In that capacity we were an artillery
unit and my job was radio communicator.**
11 **And there was one other police job.**
12 **To be honest I almost forgot about. I worked for
Shiremanstown Borough in Cumberland County for weeks,
two or three weeks before I went to Manor Township.
And that was only as a part-time officer.**
16 Q. Let me take those in order. As a reserve for
the U.S. Marines did you have any type of law
enforcement duties while you were a reserve?
19 A. **No.**
20 Q. And what caused you to stop being with the
reserves in the U.S. Marines?
22 A. **I completed my six year enlistment and at the
end of those six years I was a police officer. And to
be blunt I was working weekends already and I did not
want to, I served my country and I thought I was done.**

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1 at Manor County?
2 A. **Manor Township, no, I don't remember the
dates.**
4 Q. How about the year?
5 A. **I'm going to say summer of 2000. But again,
that's an estimate.**
7 Q. And what was your title with the Manor
8 Township Police Department?
9 A. **Police officer.**
10 Q. And how long were you employed there?
11 A. **I was continuous all the way up to when I got
hired by Susquehanna Township in I believe it was
October of 2001. So about a year and a half I believe.**
14 Q. Did you ever receive any discipline at Manor
15 Township Police?
16 A. **No, sir, I did not.**
17 Q. Did you ever receive any complaints against
18 you?
19 A. **No.**
20 Q. Were you the subject of any type of
21 investigation at Manor?
22 A. **No.**
23 Q. What caused you to leave the Manor Police
24 Department?
25 A. **So Manor is in Lancaster County, and**

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1 Q. And then at the Shiremanstown Borough you
2 were there two to three weeks, was this after you had
3 completed the Police Academy?
4 A. **Yes, it was.**
5 Q. And what caused you to leave there and I
6 believe that you went from there to Manor, what caused
7 you to leave?
8 A. **Shiremanstown Borough was part-time and I was
only getting 10, 15 hours a week and Manor Township
offered me full-time and that was the only reason why
I left Shiremanstown Borough.**
12 Q. Any other employment in the law enforcement
or public safety capacity that we haven't discussed?
14 A. **No, sir.**
15 Q. Have you received any special certifications
16 of any type in your role as a law enforcement officer?
17 A. **Yes.**
18 Q. For any department. Can you tell me about
19 those. If you can go in order that would be great. If
20 not that's fine too. Let me start again. If you can
21 go by police department that would be great.
22 A. **Sure. For Shiremanstown and Manor Township if
we're on the same page there was no special
certifications other than me receiving my training for
the Police Academy if that's what you're asking. I do**

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7 (Pages 22 to 25)

<p style="text-align: right;">Page 22</p> <p>1 have a list when I start Susquehanna and that's where 2 a lot of my certifications are from.</p> <p>3 Q. Okay.</p> <p>4 A. So starting in Susquehanna I am a field 5 training officer more or less meaning that I train new 6 officers. I have also been a school resource officer 7 more or less school police. As I said earlier I'm a 8 member of the Dauphin County Accident Reconstruction 9 Team. More or less if there's a fatal accident or a 10 near fatal accident I can assist any municipal 11 jurisdiction in Dauphin County that requests it. I'm 12 part of the Dauphin County Strike Team which is more 13 or less we will respond if there's a riot somewhere 14 and I have a certification in that.</p> <p>15 Q. Anything else?</p> <p>16 A. No. Not off the top of my head. That is it.</p> <p>17 Q. Out of those that you have mentioned are 18 there any of those certifications that happened after 19 the date of the incident after June 18, 2019?</p> <p>20 A. No. They were all previous.</p> <p>21 Q. So you were certified in all of these 22 respects on the date of the incident?</p> <p>23 A. That is correct.</p> <p>24 Q. As we said before your title today is 25 Corporal?</p>	<p style="text-align: right;">Page 24</p> <p>1 class, what were your duties?</p> <p>2 A. PFC is the first line supervisor on the 3 street. So as I explained earlier there's patrolmen 4 and then there's PFC's. The patrolman first class will 5 assist the patrolman in and I'll say in general 6 supervision when they're handling calls or if they 7 have questions about an incident that is happening. 8 It's more or less the first line supervisor.</p> <p>9 Q. Any other duties that separate a patrolman 10 first class from a patrol officer other than what 11 you've mentioned?</p> <p>12 A. Normally when you're a patrol officer you 13 don't have those I believe there were four or five 14 certifications that I told you. You normally don't get 15 those certifications until you start going up the 16 chain of command. So that's when you start becoming a 17 field training officer or when you start getting 18 specialized in certain areas of your career.</p> <p>19 Q. Those duties that you just outlined as a 20 patrolman first class, is it fair to say that those 21 were your duties on the date of the incident on June 22 18, 2019?</p> <p>23 A. That is correct.</p> <p>24 Q. And is it a fair question to ask your chain 25 of command as a patrolman first class who do you</p>
<p style="text-align: right;">Page 23</p> <p>1 A. That is correct.</p> <p>2 Q. Can you walk me through your time at 3 Susquehanna for each promotion that you received or 4 each title change that you received beginning when you 5 first started Susquehanna.</p> <p>6 A. Sure. I'm not going to know the exact date. 7 I'm going to go, and I'm thinking here. So I was a 8 patrol officer from 2001 and I'm going to have to 9 estimate this date when I got my first promotion. 2012 10 to 2013 is when I got promoted to patrolman first 11 class. So that's 2012-2013 actually till, I held that 12 rank until September of the 2021 and then that is when 13 I picked up the promotion to my current rank as 14 corporal.</p> <p>15 Q. Any other promotions?</p> <p>16 A. No.</p> <p>17 Q. Did you ever receive any demotions?</p> <p>18 A. No, sir.</p> <p>19 Q. So on the date of the incident you were a 20 patrolman first class?</p> <p>21 A. That is correct.</p> <p>22 Q. And if I see PFC on any documents that's what 23 is that stands for; is that right?</p> <p>24 A. That is correct.</p> <p>25 Q. And what are your duties as a patrolman first</p>	<p style="text-align: right;">Page 25</p> <p>1 supervise and then who do you report to as patrolman 2 first class?</p> <p>3 A. As a patrolman first class I would supervise 4 another PFC who is in lower rank than me or any 5 patrolman. As of who I report to it will be anybody 6 above me, that would be a Corporal, a Sergeant, a 7 Lieutenant, Deputy Director of Public Safety, the 8 Captain and the Chief.</p> <p>9 Q. I'm going to ask you now about some policies 10 at the Susquehanna Police Department. Are you aware 11 of any policy that instructs officers on how to 12 evaluate civilians that they encounter for mental 13 health issues?</p> <p>14 MR. MACMAIN: Riley, do you mean a 15 written policy or do you mean practice and training or 16 separating them out in separate in things?</p> <p>17 MR. ROSS: I want to just start out 18 with policies in general and then I'll get more 19 specific, just anything that you're aware of, any 20 policies that you're aware that involve making 21 evaluations of civilians for mental health issues.</p> <p>22 A. I think I understand your question. I'm 23 trying to think if we have any specific policies that 24 would govern on that. I would say there's some 25 procedure and protocol that we would follow if that's</p>

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8 (Pages 26 to 29)

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1 **what you're asking.**

2 Q. Yes. So I would like to use the loosest
 3 definition of policy as possible. So if there's
 4 practices, if there's procedures, if there's protocols
 5 I would like to incorporate all of those. So why
 6 don't we start with the procedures and protocols that
 7 were just coming to your mind and tell me about those.

8 A. **Sure. I'll just say if we have a mental**
9 health call we would respond there and we would be
10 evaluating the person in their current state to see if
11 they need any type of medical assistance or not
12 medical assistance. Again, I've been doing this over
13 20 years so a lot of it just has to come with
14 experience.

15 **I will say that we have some**
16 guidelines where we follow that if we think we need to
17 call I'm going to say a professional we have Dauphin
18 County Crisis Intervention that we can call. A lot of
19 times the guideline before we call them is is this
20 person a danger to himself or is this person a danger
21 to anybody else. And that is the guideline that we
22 use.

23 **Currently and I'll say even during**
24 the pandemic we actually have a mental health
25 counselor riding along with Susquehanna Township.

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1 She is not a police officer but she is employed by the
 2 Dauphin County Crisis Intervention Team where we can
 3 bring her on scene when she's working and use her as a
 4 resource.

5 Q. I want to go back to the guidelines that you
 6 talked about for that you follow if you need to call a
 7 professional. Are these guidelines written?

8 A. **Not that I recall that there is anything**
9 written.

10 Q. Do you recall taking a class and being taught
 11 about these guidelines? How did you become aware of
 12 the guidelines?

13 A. **So these guidelines, probably when I was a**
14 probationary officer I believe my field training
15 officer told me about these guidelines. I mean, they
16 have been around that long.

17 Q. But you don't recall seeing them in written
 18 form; is that right?

19 A. **No, sir, I don't.**

20 Q. The mental health counselor that does ride
 21 along was this program in existence on the date of the
 22 incident?

23 A. **No, sir. It was not.**

24 Q. Do you know when it was implemented?

25 A. **I don't have an exact date. I'm going to say**

1 **in the last year, year and a half.**

2 Q. And is that a program that has been reduced
 3 to writing? Have you read anything regarding that
 4 program and how that program runs?

5 A. **I personally have not seen any paperwork**
6 about it, no.

7 Q. Do you know if any such paperwork exists?
 8 A. **I would believe that there is. But again,**
9 once again, I have not seen that.

10 Q. Do you know why, I'm just asking if you know.
 11 Do you know why this program was implemented?

12 A. **I'm going to say mostly probably because of**
13 the pandemic. Our mental health cases have skyrocketed
14 and it is, it's more or less bringing the mental
15 health worker to the people instead of in person to
16 person.

17 Q. Are there any other policies or protocols,
 18 practices that you're aware that involve evaluating
 19 civilians for mental health issues?

20 A. **So as I explained, during the Police Academy**
21 we did have an instruction about mental health, about
22 first aid and about CPR. I also, the State of
23 Pennsylvania requires us yearly to take updates,
24 they're mandatory that we must complete before the end
25 of the year to keep our certification as a police

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9 (Pages 30 to 33)

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1 estimate date. The first 15 years of my employment we
 2 had person-to-person classes where we would actually
 3 give papers and we would actually have tests at the
 4 end of the class. I don't know what changed but from,
 5 I'm going to use that estimate date. From the last 6,
 6 7 years to present there is now all on line and we
 7 take on line courses with a test at the end of that
 8 course.

9 Q. Do you have access to these on line courses?
 10 What I mean is the courses that you've taken in the
 11 past on line, do you have access to them?

12 A. So are you asking like for the certifications
 13 or -- I would say yes. It's going to be part of my
 14 train file through the MPOETC, that's the Municipal
 15 Police Officers Education Training Center. That is
 16 what certifies me every year as a police officer. So
 17 I'm going to say I don't work for MPOETC but I'm going
 18 to assume that yes, they have all those training
 19 records.

20 MR. MACMAIN: Mr. Riley, if I can
 21 answer your question because it may save time. There
 22 should be a listing of every course that Corporal
 23 Haines took or any officer took through the state
 24 training agency MPOETC. There will be a list of
 25 everything they took.

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1 In terms of the actual materials
 2 they would have to be obtained through MPOETC, the
 3 state training agency. And they may or may not produce
 4 documents to a third party. I hope that answers your
 5 question.

6 I can provide a list of everything
 7 he's taken and I believe we can download it. But
 8 we're not going to have access to it unless to it
 9 unless it's an inhouse course.

10 MR. ROSS: Okay. And that's what I
 11 was going to ask for. I wanted to make sure, my
 12 understanding is that he would have access to at least
 13 a list of courses he's taken so I would like to get a
 14 list of those courses so thanks.

15 BY MR. ROSS:

16 Q. Other than what you've already discussed are
 17 there any other policies or procedures or protocols
 18 regarding evaluating a civilian's mental health status
 19 that you haven't discussed already?

20 A. None that I can recall right now. I mean, I'm
 21 going to say common sense which is not a course.

22 Q. I want to ask you specifically about the
 23 making the decision or determination to take someone
 24 to a mental health hospital. Do you receive any
 25 specialized or specific training in deciding this

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1 person should go to a mental health hospital as
 2 opposed to a jail?

3 A. I think I answered this one already. It's
 4 when I would feel that I would need to call crisis
 5 intervention and more or less ask for guidance. And
 6 that's when I would as I said earlier if I felt that
 7 they were a harm to themselves or anybody else. And
 8 that's when if I felt there was a need for that, yes,
 9 I would take them to the hospital first instead of to
 10 the prison.

11 Q. Are there any other criteria that you would
 12 use in making that determination that they needed to
 13 go to a hospital instead of a prison other than what
 14 you have just stated meaning a harm to themselves or
 15 others?

16 A. No.

17 Q. And is that based on the training that you
 18 received?

19 A. That is correct.

20 Q. And then how about the decision to reach out
 21 to crisis intervention, what criteria do you use in
 22 deciding whether or not you're going to reach out to
 23 crisis intervention?

24 A. As a police officer I guess that would be my
 25 discretion. I mean, as a police officer that is

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1 something you got to be capable of doing. We use our
 2 discretion every day as a police officer.

3 Q. Are there any guidelines that you've been
 4 taught on how to use your discretion in deciding
 5 whether to contact crisis intervention?

6 A. I would just say how I was taught from my
 7 field training officer and then my supervisors through
 8 the years. I'm going to say the experience.

9 When you are a rookie officer
 10 numerous -- the majority of time you don't go to a
 11 call by yourself. There's always a second officer
 12 there. So that officer would be a senior officer
 13 whether a supervisor or not that would be guiding me
 14 and training me and molding me to become the police
 15 officer that Susquehanna Township Police Department
 16 would want.

17 Q. Have you ever made the decision to take an
 18 individual to a hospital as opposed to a jail based on
 19 their mental health status?

20 A. Yes.

21 Q. How many times have you done that?

22 A. Well, let me back up. Maybe I misunderstood
 23 that. Have I made the decision to I'll say quote have
 24 somebody committed to a mental health hospital or more
 25 or less divert to the hospital instead of the prison.

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10 (Pages 34 to 37)

<p style="text-align: right;">Page 34</p> <p>1 Is that what you're asking?</p> <p>2 Q. Let's start with diverting to the hospital 3 instead of the prison. Have you ever made that 4 decision? And I say that meaning without regard to 5 whether you took them yourself and I'm asking you 6 about you making that determination, that decision?</p> <p>7 A. So I'm going to say yes. Can I give you a 8 particular incident, a particular date and time no. I 9 can say through my 21 years of experience I have gone 10 to Harrisburg Hospital or Osteopathic Hospital 11 numerous times where I'm going to say the arrestee had 12 to be cleared from the hospital before I could take 13 them to the prison. And when I say cleared I mean 14 medically cleared, whether it be a physical injury or 15 whether it would be mental health.</p> <p>16 Q. And just speaking strictly in the terms of 17 mental health or at least having mental health issues 18 present are you saying that you have made that 19 decision to divert someone to a hospital instead of to 20 jail?</p> <p>21 A. Yes.</p> <p>22 Q. And is there a, you used the term divert 23 first. Is there a distinction between -- did that 24 term involve as opposed to any other decision that's 25 made. Because I think you've seemed to distinguish</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Uh-hum.</p> <p>2 Q. Before you had mentioned counseling and so 3 you said that maybe they needed to go for counseling. 4 And so I wanted to just see if that was part of the 5 criteria as well, like could it be something less than 6 being a harm to themselves or to others.</p> <p>7 A. I think you're trying to -- we have to deal 8 with every circumstance as it comes. I don't want to 9 give a blanket statement and say, I have to look at 10 every situation and deal with the facts that are there 11 before I make my decision to do whatever. Does that 12 answer your question?</p> <p>13 Q. I think so. I'm really just trying to figure 14 out if there are other things that you look at other 15 than harm to themselves or others. So if that is 16 something else that you look at then that is the 17 answer.</p> <p>18 Okay. Let's focus on, I want to take 19 our attention to the actual incident that occurred. Do 20 you understand that this incident occurred on or that 21 you responded to a home on Franklin Avenue; is that 22 correct.</p> <p>23 A. Correct. That's what this incident is about, 24 yes.</p> <p>25 Q. So I'm just going to refer to Franklin</p>
<p style="text-align: right;">Page 35</p> <p>1 between diverting versus commitment. So I want to know 2 if there's a specific reason if divert means something 3 different than taking the person to the hospital?</p> <p>4 A. I think when I used the word divert, let's 5 say I'm on a scene that I was called to for whatever 6 reason. And the person was arrested I'm just going to 7 say for aggravated assault. Before I leave that 8 residence I would believe that they would need some 9 type of mental health counseling before they were 10 taken to the prison. So I'm using the word divert as 11 instead of going to the prison directly I would divert 12 to the hospital first and then get them cleared and 13 then go to the prison. That's how I'm using that word 14 divert.</p> <p>15 I don't think there's any -- if 16 you're looking for the word divert to have a 17 particular police meaning I'm just -- no.</p> <p>18 Q. And in deciding to divert someone to a mental 19 health hospital to get clearance before taking them to 20 the jail what's your criteria for deciding that that 21 person needs to go to the mental health hospital to be 22 cleared first?</p> <p>23 A. I would just say that they are a harm to 24 themselves or others.</p> <p>25 Q. So it's the same criteria we talked about?</p>	<p style="text-align: right;">Page 37</p> <p>1 Avenue. Do you know what caused you to go to Franklin 2 Avenue on the date of the incident, June 18, 2019?</p> <p>3 A. Sure. So on the date of the incident the 4 county dispatchers, there's the ones that speak over 5 our radio dispatched us to Franklin Avenue. They 6 received a 911 call that a mother was saying her son 7 was beating her husband and his father with a 8 sledgehammer. And that was actively beating, and he 9 was still to be on the scene.</p> <p>10 Q. And you responded to that call from dispatch?</p> <p>11 A. Yes, I did.</p> <p>12 Q. Were you by yourself or with a partner when 13 you responded?</p> <p>14 A. Well, I was in my own patrol car. Two other 15 officers responded along in their own patrol cars.</p> <p>16 Q. When you received a call from dispatch do you 17 know if that what you receive from dispatch is 18 recorded in any way?</p> <p>19 A. The 911 tapes, yes, is recorded.</p> <p>20 Q. What I'm asking you is that, it sounds like 21 you said to me that you received from dispatch a 22 recounting of what the 911 call is; is that correct, 23 or did you receive the 911 call yourself?</p> <p>24 A. I did not -- the 911 center receives the 25 phone call. Then the 911 center dispatches the</p>

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11 (Pages 38 to 41)

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1 information to me over my radio through my computer.
 2 Q. So my question was, the information that
 3 dispatch sends to you is that, do you know if that is
 4 recorded in any way?

5 A. Yes. I believe that it is.

6 Q. How is it recorded?

7 A. So again, I don't work for the county but I
 8 believe that the actual 911 tape is recorded. I also
 9 believe that my radio transmissions are recorded. And
 10 lastly, as I said, we receive the information over our
 11 computers. I'm going to refer to kind of like an
 12 e-mail and that information is also recorded. That
 13 information there is called a chronological report. In
 14 that chronological report it tells us what the 911
 15 call is, when the officers are responding, when
 16 they're arriving and any updated information that they
 17 may give us.

18 Q. Have you, regarding this incident have you
 19 listened to any radio transmissions from that evening
 20 since that evening?

21 A. No. Not that I believe I have. I would not
 22 have access to that.

23 Q. How about the chronological report, have you
 24 viewed that chronological report from that evening?

25 A. When it was on my actual computer that

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1 Avenue, I believe it was the 2100 block, 2000 block,
 2 I'm not sure. And came in as an active call that a
 3 mother was calling in saying that her son was actively
 4 beating her husband, his father with a sledgehammer
 5 and he was still on the scene and still had the
 6 sledgehammer.

7 Q. Do you recall whether or not dispatch
 8 mentioned to you anything about the suspect's mental
 9 health condition?

10 A. I don't recall ever being advised anything
 11 about that.

12 Q. I'm going to play the 911 tape here.

13 MR. MACMAIN: Just to be clear, he's
 14 said he's never listened to it and he wouldn't have
 15 listened to it that night. So I'm happy to have him
 16 answer questions. But just to be clear he's never
 17 heard this nor would he have heard it that night so.

18 MR. ROSS: And you raise a good
 19 question.

20 Q. Corporal Haines, have you listed to the 911
 21 tape since that incident?

22 MR. MACMAIN: I think the question is
 23 whether he's ever listened because he wouldn't have
 24 gotten the 911 call directly. The information is
 25 summarized or communicated in some form to him. So

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1 evening yes. Since no.

2 MR. ROSS: Dave, I'm going to ask for
 3 if you have access either to the transmission and/or,
 4 not and/or, but I would like the transmission and the
 5 chronological report if you have access to either of
 6 them.

7 MR. MACMAIN: I'm not sure that I
 8 have access. I'm fairly sure but I'm not positive
 9 that the 911 call from your client to 911 is recorded
 10 and has been produced by somebody, maybe the county.

11 MR. ROSS: I do have that. I do have
 12 that. But not the transmissions from dispatch to
 13 Corporal Haines.

14 MR. MACMAIN: Sure. If it's something
 15 I have access I will produce it. It sounds like it may
 16 have come from the county. I would just ask to the
 17 extent there's documents you're asking for I will try
 18 to keep a list but if you send me letter, actually to
 19 all counsel after the dep and we'll get it to you.

20 MR. ROSS: Will do.

21 BY MR. ROSS:

22 Q. So Corporal Haines, again, can you tell me
 23 again what you recall dispatch telling you about the
 24 incident at Franklin Avenue?

25 A. Sure. They gave the address on Franklin

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1 maybe the first question I think he answered was did
 2 you get the 911 call.

3 MR. ROSS: No. I'm asking him has he
 4 since then, since the incident. I know that he did not
 5 receive it but I just want for the record to know
 6 whether or not he's heard it since the date of the
 7 incident.

8 A. No, sir. I have never heard the 911 tape
 9 before the incident or after the incident.

10 Q. Okay. I'm going to start this and then stop
 11 it to see make sure you all can hear.

12 (911 CALL BEING PLAYED)

13 Q. Do you recall dispatch telling you to come
 14 around the back door to gain entry to the Franklin
 15 Avenue residence?

16 A. I know that we did. I'm not, I don't recall
 17 them telling me that specifically but we did go around
 18 to the back door so I assume that they did but I can't
 19 say for sure.

20 MR. MACMAIN: He doesn't want you to
 21 assume.

22 A. I don't recall if they told me that or not.

23 Q. When you arrived I think you stated there
 24 were other officers that on the scene already; is that
 25 correct?

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12 (Pages 42 to 45)

<p style="text-align: right;">Page 42</p> <p>1 A. I was the first officer that arrived but the 2 two other officers were right behind me. 3 Q. And you said, did you approach the residence 4 by yourself or with the other officers? 5 A. The other two officers were right with me. 6 Q. And do you know, did they both arrive at the 7 same time as well? 8 A. Very very close. I don't know if it was one, 9 two, three but we all pulled up within a very close 10 timeframe together. 11 Q. Who were the other two officers? 12 A. That was Corporal Wilson and then PFC Glen. 13 Q. And I'll let you answer this but I think I 14 know, but what was the chain of command for the three 15 of you officers on that scene? 16 A. So it was Corporal Wilson would have been the 17 officer in charge. I would have been second in charge 18 because I have more time in my rank than PFC Glen. 19 Q. And did Corporal Wilson take charge of the 20 scene? 21 A. Yes, sir, he did. 22 Q. Do you recall if dispatch told you that the 23 caller had been asked about the medical condition of 24 the suspect and stated that he snapped tonight and in 25 the last couple of days?</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MR. ROSS: 2 Q. Corporal Haines, why don't you just go ahead 3 and describe to me what happened when you arrived at 4 the Franklin Avenue residence on the date of the 5 incident. 6 A. Sure. I'll leave off after all three officers 7 walked to the rear of the residence. And there was a 8 door open. The interior door was open but a screen 9 door was locked. Corporal Wilson as I said earlier was 10 the senior officer, the lead investigator. I believe 11 it was actually his beat, his assigned area that day. 12 When we got to the door and I 13 remember this vividly, I was on the far right, PFC 14 Glen was in the middle and Corporal Wilson was on the 15 far left, and we were all looking into the door. 16 Corporal Wilson tugged on the screen door and it 17 didn't come up open. The next thing we see is Mr. 18 Riley come walking I'm going to say in the doorway but 19 maybe like 5, 7 feet away from the door from our left 20 towards our right. We see down, I'm sorry -- I see 21 down by his side a sledgehammer. So the ball of the 22 hammer is like on the ground almost, I won't call it 23 was dragging it but he still had ahold of it. 24 Corporal Wilson asked him if at that 25 time very calmly to open the door. I believe he had to</p>
<p style="text-align: right;">Page 43</p> <p>1 A. I don't recall ever being told that. 2 Q. Do you recall dispatch telling you anything 3 about the suspect's mental condition? 4 A. No, I don't. 5 MR. NORFLEET: Objection to form. 6 Q. Do you recall the dispatch telling you 7 anything about the suspect's mental condition? 8 A. No, I don't. 9 Q. Do you recall dispatch telling you at any 10 point that the caller stated that the suspect did not 11 hit anyone with the hammer? 12 A. I don't recall that. 13 Q. Do you recall dispatch ever telling you that 14 the caller believed that the suspect was a danger to 15 her and to her husband? 16 A. I don't recall them saying that. 17 Q. Is there anything about the in now hearing 18 911 tape that refreshes your memory about anything 19 that dispatch told you that you didn't previously 20 relay to me? 21 A. No. 22 MR. ROSS: Why don't we take a break. 23 It's 11:27 now. Is five minutes enough for everyone or 24 do we need longer? 25 (Recess taken.)</p>	<p style="text-align: right;">Page 45</p> <p>1 ask another time or two. Then Mr. Riley did open the 2 door. Mr. Riley was asked to step outside and at that 3 time he was detained by myself. When I mean detained 4 he was put in handcuffs but not officially arrested. 5 At this time, during this whole time 6 there was an absolute downpour of rain. Corporal 7 Wilson directed me to stay with Mr. Riley while he and 8 PFC Glen went into the residence. I escorted Mr. Riley 9 probably no more than 10 or 15 feet away from the door 10 and underneath a big tree more or less to protect us 11 from the rain. I stayed with him there. Mr. Riley and 12 I from what I recall we never even conversed. 13 Within a few minutes Corporal Wilson 14 came back outside and directed me to take Mr. Riley 15 down to the booking center for charges of aggravated 16 assault. At that time Patrolman D'Arcy arrived on 17 scene and we both escorted Mr. Riley down to my patrol 18 car. He was searched, nothing was found and he was put 19 in the rear of my patrol car. 20 Q. Anything else happen at the scene? 21 A. Nothing that I can recall. It was pretty 22 simple. 23 Q. Did you drive away at that time or did more 24 time elapse before you drove away? 25 A. I would say within a minute, two minutes at</p>

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13 (Pages 46 to 49)

Page 46

1 the most I drove away. I already had my directions and
 2 what I was supposed to do. Again, it was a downpour. I
 3 kind of remember wiping my face off and kind of
 4 getting myself situated before I drove away but there
 5 wasn't much time lapse.

6 Q. When you first saw Ty'rique Riley appear in
 7 the doorway did he say anything?

8 A. I remember him mumbling something but nothing
 9 that I could make out. I also heard some voices from
 10 inside but, again, nothing that I can understand.

11 Q. For Mr. Riley when you say you couldn't
 12 understand what he was saying was that because you
 13 couldn't hear it audibly or you couldn't kind of
 14 understand it because the words coming out of his
 15 mouth didn't make sense?

16 A. I couldn't hear it audibly because remember I
 17 said, there was a good five to seven foot distance
 18 with a closed door. And again, when I say it was a
 19 downpour it was a downpour of rain.

20 Q. When Corporal Wilson asked him to open the
 21 door did he respond, did Ty'rique Riley respond in any
 22 way verbally?

23 A. Not that I recall, no.

24 Q. And then you talked about him stepping
 25 outside, you were walking under a tree. Do you recall

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1 hospital.

2 Q. Was that something that you had considered
 3 and decided that that was not necessary or was that
 4 something that you had considered?

5 A. No. There was no indication that I needed to.

6 Q. As a PFC do you have the ability to if you
 7 had learned any information that had made you feel
 8 that an individual in your custody needed to go a
 9 hospital did you have the authority, would you have
 10 the authority to take that individual to a hospital?

11 A. Absolutely. Even a patrolman if they know
 12 something that they don't see is right they need to
 13 bring it up to the supervisor. So if I or I'm just
 14 saying Patrolman Smith would have saw something, yes,
 15 we have the right to divert if we need to.

16 Q. At any point that evening did you ever
 17 contemplate taking Ty'rique Riley to a hospital?

18 A. Again, I'm always constantly evaluating the
 19 situation. That's what a police officer does. There
 20 was no clues that gave me any indication that I would
 21 have needed to take Mr. Riley to the hospital.

22 Q. And I'm not asking for the entire night. I'm
 23 not just talking about up until the time you placed
 24 him in your patrol car. At any point after you drove
 25 away from Franklin Avenue did the situation cause you

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1 him saying anything during that time that he came out
 2 of the house?

3 A. No, sir. Nothing at all.

4 Q. With regard to Corporal Wilson directing you
 5 to take him to the booking center was there discussion
 6 about him going to the booking center or was there
 7 simply that was the order that you were given?

8 A. That was the order that I was given.

9 Q. Do you know if Corporal Wilson had a
 10 discussion with anyone about whether or not Ty'rique
 11 should go to a hospital that evening?

12 A. I never went into the house so I don't know
 13 what was said in the house with anyone else.

14 Q. My next question is not going to be limited
 15 to what was said in the house. I'm just asking you,
 16 do you know if Corporal Wilson had a discussion with
 17 anyone regarding taking Ty'rique Riley to a hospital
 18 that evening?

19 A. He never said anything to me. I don't know if
 20 he said anything to anybody else.

21 Q. Did you have an opinion -- at the time that
 22 Corporal Wilson had directed to you take Ty'rique
 23 Riley to the booking center did you have an opinion on
 24 whether or not Ty'rique Riley should go to a hospital?

25 A. Yeah. I didn't think he needed to go to the

1 to consider taking him to a hospital?

2 A. No, sir.

3 Q. You heard the 911 tape now. Is there any
 4 other information that you heard on the 911 tape that
 5 you believe had you been told would have given you a
 6 reason to take him to a hospital?

7 A. I don't think there's any new information
 8 that would have changed my mind.

9 Q. How about the fact that Carmen Riley had
 10 reported that in response to a question as to whether
 11 or not he had mental health issues that he had
 12 snapped, would have that have had an impact on your
 13 decision to take him to the hospital?

14 MR. MACMAIN: Objection to the form.

15 Q. You can answer the question if you understand
 16 it.

17 A. Ask it again for me, please.

18 Q. Did you hear on the 911 tape when Carmen
 19 Riley was asked if her son had a mental condition?

20 A. Yes.

21 Q. And did you hear her respond that he had
 22 snapped tonight and also it may have been the last
 23 couple of days?

24 A. I did hear that, yes.

25 Q. If you had been told that information about

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14 (Pages 50 to 53)

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<p>1 Ty'rique Riley would that have impacted your, would 2 that have been something you would have considered in 3 taking him to a hospital?</p> <p>4 Let me ask that again. I'm sorry.</p> <p>5 If you had heard that information would that have 6 caused you to take Ty'rique Riley to a hospital.</p> <p>7 A. Simply just that information no.</p> <p>8 Q. And can you tell me why not?</p> <p>9 A. Well, one of the things that I'm aware of is 10 when I take somebody to the booking center there is a 11 medical professional there that does evaluate the 12 arrestee and they have to be cleared medically before 13 I'm able to leave. But begin, there was no indication 14 that there was any type of mental health need in my 15 dealing with Mr. Riley.</p> <p>16 Q. When you say that the individual needs to be 17 cleared medically before you're allowed to leave can 18 you tell me more about that, what do you mean by that?</p> <p>19 A. Sure. And I don't have a list of questions 20 but I believe there may be a list of questions that 21 the, I'm going to call it the nurse. I'm not sure 22 what her title is but I'm going to call her the nurse, 23 comes and talks to the person. And I'm going to use 24 quotations, evaluates the person. They evaluate them 25 for medical needs and then they normally say yes or</p>	<p>1 supervisor?</p> <p>2 A. No. I don't know any of them personally.</p> <p>3 Q. With regard to this evaluation that you're 4 aware that occurred at the booking center, do you 5 receive some type of training that has told you that 6 the evaluation that occurred at the Dauphin County 7 Booking Center a satisfactory evaluation that can 8 address mental health issues?</p> <p>9 MR. MACMAIN: Objection to form.</p> <p>10 Q. Do you understand the question?</p> <p>11 MR. MACMAIN: Riley, I'm not sure I 12 understand your question. Your question is what 13 assurances does the officer have or what kind of 14 training does he have that Dauphin County and/or Prime 15 Care's evaluation is a good evaluation?</p> <p>16 Q. So, Corporal Haines, you have received 17 training as to resources that you can use to help you 18 evaluate mental health issues, right? You told us 19 about the Crisis Intervention Center; is that correct?</p> <p>20 A. That is correct.</p> <p>21 Q. Have you been given specific places that you 22 can take an individual for mental health evaluations?</p> <p>23 A. I don't think there's any particular place, 24 No, if I'm understanding your question.</p> <p>25 Q. I believe before you mentioned taking someone</p>
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<p>1 no, we can accept this person.</p> <p>2 Q. And do those medical needs include mental 3 health needs?</p> <p>4 A. I believe so, yes.</p> <p>5 Q. And what's the basis for your belief that it 6 does?</p> <p>7 A. Just part the questions that they ask from my 8 experience of dropping off numerous individuals there.</p> <p>9 Q. What are those questions that they ask that 10 you believe that they're evaluating for mental health 11 needs.</p> <p>12 A. I don't know if I know the questions. I know 13 they ask are you injured, like physically injured. I 14 can't give you the answer of what the questions they 15 ask.</p> <p>16 Q. And did that occur with Ty'rique Riley that 17 night?</p> <p>18 A. To the best of my knowledge yes.</p> <p>19 Q. Do you recall being given clearance to leave 20 because of an evaluation that had occurred to Ty'rique 21 Riley?</p> <p>22 A. I recall the and I don't know what the rank 23 is of the shift supervisor from the prison saying that 24 I was cleared to leave.</p> <p>25 Q. Do you know the name of that shift</p>	<p>1 to Harrisburg Hospital?</p> <p>2 A. Correct.</p> <p>3 Q. Have you been trained that that is an 4 appropriate place to take someone for a mental health 5 evaluation?</p> <p>6 A. I don't if I've been trained but through 7 common practice, past practice. If that answers your 8 question.</p> <p>9 Q. That's what I'm getting at. I'm getting at 10 whether or not this is something you have been taught 11 as opposed to this has been your experience. So with 12 regard to the Dauphin County Booking Center has 13 anyone, has your training ever said that the Dauphin 14 County Booking Center is a place where you can take 15 someone for a mental health evaluation?</p> <p>16 A. My training has taught me through my 17 experience that if the Dauphin County Prison accepts 18 somebody for I am cleared of any liability medically. 19 And that I am free to go. That they more or less 20 accept the responsibility of my prisoner and now it's 21 their problem. Does that make sense? Not their 22 problem. That's not the right word. It is their 23 authority to make sure this person is okay.</p> <p>24 Q. Okay. So what I'm hearing you saying is that 25 they will then assume the responsibility for your</p>

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15 (Pages 54 to 57)

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<p>1 prisoner if they have cleared you to leave; is that 2 correct?</p> <p>3 A. Yes. Responsibility is a better word than 4 what I used, yes.</p> <p>5 Q. Separate from them accepting responsibility 6 I'm interested in just any training that you receive 7 regarding getting an individual a mental health 8 evaluation. So with regard to your experience for 9 Dauphin County booking you talked about medically 10 being medically cleared. Do you mean medically to 11 include mental health issues being addressed?</p> <p>12 A. Yes. Because they are physically taking 13 responsibility of a physical body. And more or less 14 saying, Corporal Haines, you are now allowed to leave. 15 When I say taking responsibility I mean medically, 16 mentally, the physical body, the whole thing.</p> <p>17 Q. Separate from the liability issue or the 18 responsibility issue is it safe to say that you have 19 not received any training where you have been told 20 that if you need to have someone evaluated for a 21 mental health issue you've never been told that 22 Dauphin County Booking is the place to take someone; 23 is that correct?</p> <p>24 MR. MACMAIN: Objection. Are you 25 assuming in that question that the person doesn't have</p>	<p>1 not to the hospital in my practice I would have been 2 told that. 3 In past practice there was at least 4 one occurrence where they did not accept somebody 5 medically because of a I believe it was a cut in the 6 finger. And I had to take them to the hospital and get 7 they medically cleared and then bring them back. Does 8 that answer your question?</p> <p>9 Q. Yeah, it does. Thank you. And for Ty'rique 10 Riley's case, you did not believe that he needed to go 11 to a hospital for a mental health evaluation; is that 12 correct?</p> <p>13 A. No. If I thought there was a need I would 14 have taken him to the hospital.</p> <p>15 Q. I want to show you some videos of patrol cars 16 arriving at Franklin Avenue and I'm not sure if I have 17 yours. Give me one second.</p> <p>18 MR. ROSS: Maybe I can try and 19 shortcut this and, Dave, you can help me here. I have 20 three different cameras, what I think are three 21 different patrol cars approaching. One is marked 22 Richard Wilson, one is marked Richard Adams and one 23 marked Demetrius Glen.</p> <p>24 Q. Is there any reason that the vehicle you were 25 driving would have been labeled with any of those</p>
<p style="text-align: center;">Page 55</p> <p>1 criminal charges and there's no legal authority to 2 take him to prison as opposed to a facility?</p> <p>3 MR. ROSS: No. I'm not making those 4 assumptions. I'm just asking, I'm just clarifying or 5 getting confirmation that he's never been told that 6 Dauphin County booking is the place to take someone to 7 get a mental health evaluation.</p> <p>8 MR. MACMAIN: Objection to form. I'm 9 not sure what you're asking him.</p> <p>10 Q. Have you ever been told that the Dauphin 11 County Booking Center in the place, is a suitable 12 place to take an arrestee for a mental health 13 evaluation?</p> <p>14 MR. NORFLEET: Objection to form.</p> <p>15 Q. You can answer the question, Corporal.</p> <p>16 A. I don't know that I've ever been told that. 17 So I would call, if I felt there was a need that night 18 for a mental health evaluation I would have taken him 19 to the hospital. I did not feel that there was a need. 20 So when I take him to the prison, and again, I'm going 21 to use the nurse. I don't know what term they use for 22 their medical person that clears them. The nurse is 23 also a second evaluator of I'm going to say my 24 decision. If the nurse would have thought that I 25 would have been wrong in taking him to the prison and</p>	<p>1 names?</p> <p>2 A. No. Mine should be with my name and then Unit 3 1235. That's the car number.</p> <p>4 MR. MACMAIN: And, Riley, I'm looking 5 in my folder. I have four folders. Christopher Haines 6 and that where his dash-cam video is. There's two. One 7 is looking forward at the front of the car. One is 8 looking internally back towards Mr. Riley. 9 I have a folder labeled Demetrius 10 Glen. And I've not looked at it recently but it looks 11 like a dash-cam video is in that folder. And then 12 there is one Richard Adams. I'm not sure what's in 13 there. It looks like there's some type of --</p> <p>14 MR. ROSS: There should be two for 15 Richard Adams and two for Richard Wilkinson.</p> <p>16 MR. MACMAIN: Yeah. I'd have to look 17 at them. I know there's two for now Corporal Haines, 18 one looking forward, one looking back to the back 19 seat.</p> <p>20 MR. ROSS: Right. So, David, those 21 two are, seem to be both of arrests like taking him to 22 the booking center. The videos for the other officers 23 seem to be videos arriving at Franklin Avenue. But I 24 don't think I have a Corporal Haines video arriving at 25 Franklin Avenue.</p>

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16 (Pages 58 to 61)

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1 MR. MACLAIN: Okay. So why don't we
 2 start doing questions, he might, I don't know if he
 3 can answer.

4 BY MR. ROSS:

5 Q. Well, let me ask you this. Demetrius Glen, is
 6 that an officer that arrived on the scene; are you
 7 aware?

8 A. That is PFC Glen.

9 Q. And how about Richard Adams?

10 A. That is Sergeant Adams. Sergeant Adams was
 11 never on the scene when I was on the scene. So I
 12 believe he arrived after I left with Mr. Riley.

13 Q. And then Richard Wilson is Corporal Wilson?

14 A. That is correct.

15 MR. ROSS: Yeah. Dave, I don't think
 16 I have the video of him arriving to the scene and so
 17 I'll ask for that. Because I do have a few videos that
 18 you're referring to for Corporal Haines, the one of
 19 facing forward and then looking back at Ty'rique
 20 Riley, but I don't have the video of him arriving
 21 there.

22 MR. MACMAIN: I don't know if there
 23 is a video. Do you --

24 A. So I have never seen a video of me arriving.

25 Maybe if explain how our car cameras work.

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1 Q. Sure.

2 A. So our car cameras are actively recording all
 3 the time, more or less 24/7. But nothing is saved
 4 until we have manually pushed the button to record or
 5 we activate our overhead lights. Or we go over I think
 6 it's 82 or 83 miles an hour. Then it automatically
 7 comes on.

8 I can't say for sure. Again, I've
 9 never seen my video. I may -- the other officers may
 10 have activated their lights and that's what activated
 11 the camera. I recall activating my camera in my car
 12 manually when I drove away because that is part of our
 13 policy and procedure if we have a prisoner.

14 Q. And do you recall if you rode to the Franklin
 15 Avenue address with your lights on?

16 A. I don't recall if I did or didn't. I say I
 17 can recall. I was the first physical car there so I
 18 was assuming, I don't want to assume. I was the first
 19 car there and I cannot recall whether I had my
 20 overhead lights on or not.

21 MR. MACMAIN: Mr. Ross, just one
 22 thing. If there's video of him arriving I'll provide
 23 it. If there's no video it wasn't downloaded or there
 24 wasn't any video to start with.

25 MR. ROSS: Yes. So that will be an

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1 official request because I think that his video is
 2 very important. If it has been captured we definitely
 3 want it.

4 BY MR. ROSS:

5 Q. So let's move on to what happened when you
 6 got to the booking center. So please tell me what you
 7 recall. First of all on your journey to the booking
 8 center is there anything that you recall occurring
 9 between yourself and Ty'rique Riley?

10 A. So Mr. Riley kept saying yo and then he would
 11 ask me a question. I would answer him and then there
 12 would be no response. Within another short time period
 13 he would go yo again and ask me some other question. I
 14 think some of the questions were, I'm sure it's all on
 15 the video, why did you arrest me, can you take me
 16 home. I think at one point I think he said, I didn't
 17 do this.

18 When I was getting close to the
 19 booking center he kicked the -- the car that I had had
 20 a prisoner cage in it. He kicked the prisoner cage and
 21 there was loud racket behind me and I told him to
 22 knock it off. Soon after that I don't recall exactly
 23 why I knew it but he took his seat belt off and he
 24 really started moving around. So per policy we do
 25 seat belt everybody in. I believe that was almost on

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1 Mall Road, only a couple hundred yards away from the
 2 booking center.

3 So when I arrived at the booking
 4 center I pushed the little button that notifies the
 5 booking agents that I'm out there and that I have a
 6 prisoner. And then I notified them that my defendant
 7 was moving around a lot in the back of the car and I
 8 didn't know why and I asked somebody to come out.

9 Q. And what happened next? I'm sorry, Corporal.
 10 You said you pushed a little button. What are you
 11 referring to?

12 A. So there's a button that would go, it's a
 13 stand to notify the booking agents inside. It's like a
 14 doorbell and then I can converse with them real
 15 quickly. And that's when I asked them to come out.

16 Q. This is something that you pulled up to in
 17 your vehicle?

18 A. Yes.

19 Q. And you rolled down the window?

20 A. I rolled down the window. I literally could
 21 touch it with my left hand.

22 Q. Got you. Okay.

23 A. I don't recall. At one point I tell the
 24 booking agents, I asked them to come out that my
 25 subject is moving around in the back of the car and

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17 (Pages 62 to 65)

<p style="text-align: right;">Page 62</p> <p>1 that is when I say, I'm not sure if it's then or when 2 I actually pull into the garage and they come out. I 3 say, I'm not sure if my detainee is under the 4 influence or if it is a mental health. I say that, I 5 don't recall exactly but I'm sure it's right on the 6 video when I do say it.</p> <p>7 Q. Have you viewed this video since the 8 incident?</p> <p>9 A. Yes, I have.</p> <p>10 Q. More than once?</p> <p>11 A. Yes.</p> <p>12 Q. How many times do you believe that you viewed 13 it?</p> <p>14 A. Two, three, four.</p> <p>15 Q. When is the last time that you viewed it?</p> <p>16 A. I did view it this morning here.</p> <p>17 Q. Why did you tell the -- why did you state 18 that you didn't know if he was behaving in the way he 19 was behaving because he was high or if it was a mental 20 health issue?</p> <p>21 A. Because of our conversation -- I hate to call 22 it a conversation. What he was saying in the back of 23 the car was not an intelligent conversation, like it 24 was all one sided on his end. And if he would ask me 25 a question it didn't seem like he really cared what my</p>	<p style="text-align: right;">Page 64</p> <p>1 into the booking center. 2 So I put my firearm into the lock 3 box and at that time the booking agents have gotten 4 Mr. Riley out of my car. They start walking Mr. Riley 5 towards the door and that's when Mr. Riley more or 6 less goes limp and almost like falls on the ground.</p> <p>7 Q. Do you hear, did Mr. Riley make any 8 statements or did he make any statements when the 9 guards approached him while he was in the vehicle?</p> <p>10 A. None that I heard.</p> <p>11 Q. How about when he was taken out of the 12 vehicle, did you hear him make any statements?</p> <p>13 A. No.</p> <p>14 Q. How about any statements made by the guards 15 to him to Mr. Riley?</p> <p>16 A. I recall them asking him to get out of the 17 car. I don't recall if he had a response or not.</p> <p>18 Q. And do you know the identity of any of the 19 guards?</p> <p>20 A. No. I do not.</p> <p>21 Q. How about as you sit here today, you don't 22 know who they are even today; is that right?</p> <p>23 A. If they were in this room with me I don't 24 think I would be able to the identify them.</p> <p>25 Q. And what happened next?</p>
<p style="text-align: right;">Page 63</p> <p>1 answer was. From my experience of years in law 2 enforcement that could tell me that he could be under 3 the influence of some substance.</p> <p>4 Q. But you also thought that it could be a 5 mental health issue; is that correct?</p> <p>6 A. Yes.</p> <p>7 Q. And is this belief that it could have been 8 substance abuse, a substance or mental health issue, 9 is this something that developed through the 10 conversation or what you say, we'll put in quotes --</p> <p>11 A. Yes.</p> <p>12 Q. -- conversation that you had during 13 transporting him to the booking center?</p> <p>14 A. I would say yes.</p> <p>15 Q. Nothing about, this wasn't developed based on 16 anything that you saw in him before transporting him 17 to the booking center?</p> <p>18 A. Correct.</p> <p>19 Q. And what happened next?</p> <p>20 A. We were inside, they, when I say they, the 21 booking center closes the garage door behind us. I see 22 I believe it was three guards came out and that's when 23 I conversed with them real quickly. They walked to the 24 back of my car and to Mr. Riley while I walk over to 25 the gun locker so I'm not allowed to take my firearm</p>	<p style="text-align: right;">Page 65</p> <p>1 The guards if we're going the call them 2 guards take him inside and I follow behind. We have to 3 go through two doors. Once we get inside of the actual 4 booking center where the booking room is that's when 5 Mr. Riley starts to become more agitated.</p> <p>6 Q. What do you mean by that?</p> <p>7 A. He wasn't listening to the guards. He was 8 trying to pull away from them a little bit.</p> <p>9 Q. And do you recall him saying anything? Do 10 you recall Tyrique Riley saying anything?</p> <p>11 A. I don't recall if he had any conversation 12 with them.</p> <p>13 Q. How about the guards, do you recall them 14 saying anything to him or at all?</p> <p>15 A. I remember them giving him I'm going to say 16 commands. I couldn't tell you what the commands were.</p> <p>17 Q. What happened next?</p> <p>18 A. He just continued to resist them. They were 19 asking him to do certain things. At one point he just, 20 I'm going to use the word argumentative. I don't know 21 if he was verbally talking to them but he was just not 22 listening to them and the guards took him to the 23 ground.</p> <p>24 Q. Do you recall what kind of commands the 25 officers were giving to Tyrique Riley?</p>

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18 (Pages 66 to 69)

<p style="text-align: right;">Page 66</p> <p>1 A. I don't. I'm sure it's on the video. Just the 2 normal commands. I know, well, I would say I recall 3 like that they probably, no, not probably. They would 4 have been trying to search him to make sure there 5 weren't any weapons on him that I might have missed 6 and just more or less directing him towards the bench. 7 And he was refusing to go do so.</p> <p>8 Q. The video that you said you watched was that 9 one video or more than one video of what occurred at 10 the booking center?</p> <p>11 A. I think it's all one video but there's two 12 different views from two different cameras.</p> <p>13 Q. Did the video you watched or the videos that 14 you watched did it contain audio?</p> <p>15 A. No. I don't believe there was any audio from 16 the prison.</p> <p>17 Q. You had mentioned before that you had said 18 about, you know, you didn't know if it was the high or 19 mental health issue. I'm assuming that video had 20 audio, correct?</p> <p>21 A. Yes. I understand where you're going I 22 believe. I had my mic pack still on me. My mic pack 23 is my voice recorder. So when I walked into the 24 booking room that was still recording. And I believe 25 that's the audio you're talking about. I don't believe</p>	<p style="text-align: right;">Page 68</p> <p>1 you're saying?</p> <p>2 A. I don't know what exactly it says but I 3 believe it says all electronic devices which would 4 include a body cam or the mic.</p> <p>5 Q. And the direction is to leave electric 6 devices in your vehicle?</p> <p>7 A. Uh-hum, right.</p> <p>8 Q. And either before this incident had you had 9 occasions where you've gone to the booking center and 10 left your camera and microphone in your vehicle per 11 that instruction?</p> <p>12 A. Yes.</p> <p>13 Q. What else occurred at the booking center?</p> <p>14 A. I think where we left off he was, Mr. Riley 15 was taken to the ground. He was resisting the guards 16 there. I believe it was three males. There was also a 17 4th guard who was a female there that came over and 18 assisted the guards while Mr. Riley was on the ground. 19 They were trying to get him under control.</p> <p>20 At one point one of the guards did 21 pepper spray him and it seemed to calm him down a 22 little bit. And at one point I know from past practice 23 they put leg shackles on. There was leg shackles up on 24 the booking desk and I asked the female guard did she 25 want me to bring the leg shackles over. It</p>
<p style="text-align: right;">Page 67</p> <p>1 there was any audio from the actual prison.</p> <p>2 Q. Okay. That's exactly what I was wanted to ask 3 so thank you for clearing that up.</p> <p>4 A. Sure.</p> <p>5 Q. Did there come a time when your mic pack was 6 turned off while you were still at the booking center?</p> <p>7 A. I know it abruptly ends. I don't remember 8 turning it off but the battery shelf life if that's 9 what we're going to use those words is not very long 10 so at times they just abruptly turn off.</p> <p>11 Q. You said you don't recall turning it off. 12 Does that mean that you may have turned it off and 13 just forgot or are you saying that like I didn't turn 14 it off and this may have been what caused it to go 15 off?</p> <p>16 A. So there is a sign that the officers are 17 supposed to leave their, all body cams and/or mics out 18 in the vehicle. And I did not, I left my mic pack on 19 that day. So I don't know if I turned it off or if the 20 battery died is my answer.</p> <p>21 Q. When you say there's sign are you saying 22 there's a sign at the booking center?</p> <p>23 A. Yes.</p> <p>24 Q. And it directs officers to leave their 25 cameras and microphones in their vehicle; is that what</p>	<p style="text-align: right;">Page 69</p> <p>1 appeared she was having a little trouble controlling 2 Mr. Riley's legs, she said yes. I bring the leg 3 shackles over to her or over to Mr. Riley and I 4 actually put the leg shackles on Mr. Riley.</p> <p>5 Q. Do you recall if you put the leg shackles on 6 before or after he was pepper sprayed?</p> <p>7 A. Honestly I don't know. I'm sure the video 8 would show that.</p> <p>9 Q. What next?</p> <p>10 A. I know there was some talking to Mr. Riley 11 was gotten up. There was some talking with the guards 12 amongst themselves and soon thereafter the, I'm going 13 to assume it was the shift supervisor that dismissed 14 me and said that I was free to leave.</p> <p>15 Q. When you stated that Ty'rique Riley was 16 brought up and there was talk amongst the guards what 17 did you hear them saying?</p> <p>18 A. I don't recall exactly what they said. I 19 mean, it was -- after they got him up I stepped back 20 another 10 or 15 feet. I'm not exactly sure how it 21 was so I'm not sure what they said. So I'm in their 22 house so -- I'm in their house so if they have any 23 questions they will ask me or if I have any questions 24 I will ask them. Does that make sense? I don't know 25 if I explained that one.</p>

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19 (Pages 70 to 73)

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<p>1 Q. No, I understand. Even if you don't recall 2 everything that was said do you recall them saying 3 anything?</p> <p>4 A. I don't recall them -- I remember them 5 conversing amongst themselves. I have no idea what 6 they said.</p> <p>7 Q. Ty'rique Riley, do you recall him saying 8 anything either while he was on the ground or when he 9 stood up, do you recall him saying anything?</p> <p>10 A. No, I do not remember. Because I stepped 11 back 10, 15 feet and.</p> <p>12 Q. Well, I'm not just talking about just when 13 you stepped back. Like for instance, you said that you 14 put the leg shackles on him. Do you recall him saying 15 anything at any point in the booking center?</p> <p>16 A. No.</p> <p>17 Q. How about do you recall him saying get off me 18 or cursing anyone, anything like that?</p> <p>19 A. I remember him being boisterous at times like 20 being loud. I do not know what he was saying or if he 21 was making any other type of noises. I'm just going to 22 be very generic and boisterous.</p> <p>23 Q. And I need to harp on this because it's 24 important because I want to make sure I have a clear 25 understanding of what you heard. There's a difference</p>	<p>1 that correct?</p> <p>2 A. That is correct.</p> <p>3 Q. The audio will kick in so I just wanted to 4 have a record of why we can't hear the beginning. 5 Corporal Haines, did you hear him mention something 6 about possibly sexual assault?</p> <p>7 A. Yes.</p> <p>8 Q. Was there any allegations of any sexual 9 assaults that occurred that you were responding to 10 that evening regarding Ty'rique Riley?</p> <p>11 A. I was never told of any allegations of sexual 12 assault. Again, I never spoke with his parents so I 13 was never made aware of any such allegations.</p> <p>14 Q. What did you think when he mentioned that at 15 the time? Do you recall thinking anything when he 16 mentioned sexual assault?</p> <p>17 A. It didn't spark any interest with me if 18 that's what you're asking.</p> <p>19 Q. Okay. I'm going to resume the video. Corporal 20 Haines, those questions that you just gave you to 21 Ty'rique Riley what caused you to ask those questions?</p> <p>22 A. Because he was moving around in the back of 23 the car a lot. And as I said before, he was asking me 24 questions like yo, take me home, yo, do this. But he 25 never, when I would respond to him he wouldn't respond</p>
Page 71	Page 73
<p>1 between someone not saying anything at all and someone 2 saying something but you're just not understanding it 3 or remembering it. Are you saying that Ty'rique Riley 4 was saying something you just don't know what it was 5 or you don't recall him saying anything at all?</p> <p>6 A. I remember him saying something. I don't 7 remember exactly what he said at all.</p> <p>8 Q. I want to take a, actually I want to -- let's 9 look at the video.</p> <p>10 MR. ROSS: Dave, I still need to take 11 a pause and just read over that document because I'm 12 probably going to introduce it as an exhibit but I 13 haven't seen the whole thing that you sent over this 14 morning. So why don't we do the video first and then 15 I'll review the document after that.</p> <p>16 (Video being played.)</p> <p>17 Q. Do you see that?</p> <p>18 A. Yes, I can.</p> <p>19 Q. Do you recognize that's Ty'rique Riley?</p> <p>20 A. Yes, I do.</p> <p>21 Q. And you see that his lips are moving but we 22 can't hear anything. Can you explain that?</p> <p>23 A. I assume there's a delay in the mic pack 24 picking it up.</p> <p>25 Q. This is him in the back of your vehicle; is</p>	<p>1 back to me. So it was like he wasn't even wanted to 2 start the conversation. He just wanted to say 3 something and not have an intelligent conversation 4 among ourselves. It gave me the impression that he was 5 under the influence of something.</p> <p>6 Q. With regard to being under the influence of 7 something did you receive any training as to how to 8 treat a civilian that you suspect to be under the 9 influence of something?</p> <p>10 A. Well, sure. I mean, that's basic first aid 11 through the Police Academy, through my yearly updates, 12 good common sense again. A lot of the training that we 13 talked about earlier.</p> <p>14 Q. Could that also, could someone being under 15 the influence be a reason to divert someone to a 16 hospital rather than a jail?</p> <p>17 A. I believe that it could be. But it wasn't in 18 this instance.</p> <p>19 Q. When you say it wasn't in this instance what 20 do you mean?</p> <p>21 A. I didn't think there was any need to take him 22 to the hospital that night. I mean, as I said earlier 23 every instance has to be evaluated on its own merits. 24 The merits of this case did not give me any reason to 25 go to the hospital that night.</p>

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20 (Pages 74 to 77)

Page 74	Page 76
<p>1 Q. Have there been occasions where you have 2 taken someone who you suspected to be under the 3 influence where you've diverted them to a hospital 4 rather than a jail because of your suspicions that 5 they were under the influence?</p> <p>6 A. I would say -- give me a second to think about that one. I would say if we're going to -- no. I don't recall us diverting anybody to the hospital. I've known on the scene for like public intoxication some people transport to the hospital via ambulance.</p> <p>11 Q. So that's the only occasion where you can 12 recall someone going, someone who you suspect to be 13 under the influence going to a hospital rather than a 14 jail?</p> <p>15 A. Yes.</p> <p>16 Q. I'm going to start the video again. Just for 17 the record we're at the 6:45 minute, 6 minutes, 45 18 seconds. I'm going to pick up from there.</p> <p>19 Corporal Haines, what did you hear 20 Ty'rique say regarding the feds?</p> <p>21 A. It's hard to make out what he's saying. Don't forget, I'm driving at this time so I'm multi-tasking and there's a petition between him and I. So I believe this individual was probably clearer than today than what it was the day I was driving or the day of the</p>	<p>1 and that's why you told him he was actually going to 2 booking. Is my assumption incorrect?</p> <p>3 A. No. I think that's a fair assumption, yes.</p> <p>4 Q. Is that when you were referring to earlier in 5 your testimony when you were pressing a button you 6 were communicating with those at the booking center?</p> <p>7 A. Yes. That's when I said it was like ringing a doorbell.</p> <p>9 Q. Thank you. So Corporal Haines, I think you 10 explained this before. I just want to make it clear 11 for the record. If we can still hear audio is that 12 because the audio is being picked up by your body mic 13 that's on your person; is that correct?</p> <p>14 A. Yes. So the system that we had was there's cameras in the car and I had a mic on my person. It's different from what Susquehanna Township uses today.</p> <p>17 Q. How is it different?</p> <p>18 A. Today we actually have body cams on our person with the camera the microphone in the center inside of my chest. Back in 2019 the cameras were in the car and no camera on my person and a mic was up here. I always put mine on my right shoulder.</p> <p>23 Q. And the camera in the car does not record 24 audio; is that correct?</p> <p>25 A. I don't believe so.</p>
Page 75	Page 77
<p>1 incident.</p> <p>2 Q. Your response was that responding because you 3 did not hear him or because you did not understand why 4 he was reference the feds?</p> <p>5 A. I heard it here today. I did not hear him the day of the incident.</p> <p>7 Q. So your response was because you did not hear 8 what he said? Your response on the video when you 9 said to him what is because you did not hear what he 10 said. Is that what you're saying?</p> <p>11 A. Maybe we need to back it up but.</p> <p>12 Q. Okay. I'll back it up. Go back to the 9:42 13 mark. So your response there was -- what I'm asking 14 is, did you hear him say the he was going to the feds 15 and that's what you're responding to or were you 16 responding that you did not hear what he said?</p> <p>17 A. I think when he said am I going to the feds my response was what as in I didn't understand what he just said.</p> <p>20 Q. I'm going to continue from there. We're at 21 the 10 minute mark.</p> <p>22 So Corporal Haines, I want to go 23 back to the incident because when I heard it sounded 24 to me like you heard him say feds but didn't 25 understand why he would think he was going to the feds</p>	<p>1 Q. You talked earlier about recordings coming on 2 under certain conditions. For instance lights are on, 3 a certain speed or manually activated. Is that only 4 regarding the actual recording in the vehicle or does 5 that related to the microphone as well?</p> <p>6 A. So you can turn the recordings on in the car and then you will also have to turn on the microphone that would be on my person.</p> <p>9 Q. Is there any condition where the microphone 10 on your person automatically is activated or does it 11 always have been to be manually activated?</p> <p>12 A. So if it is on my person from, again, it's been, we switched to a different system. If it's on my 14 person it will be automatically activated when I turn 15 the car on. If the microphone is up in the charging case it will not be activated.</p> <p>17 Q. And when you say -- again, and thanks for 18 that's clarification. We're talking about the system 19 as it existed on the date of the incident in 2019. You 20 said if it's on your person the microphone will be 21 automatically activated when you turn the car on. Do 22 you mean when you turn the car's recording devices on 23 or actually turn on the car in the sense of turning on 24 the ignition?</p> <p>25 A. The recording devices, not actually just</p>

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21 (Pages 78 to 81)

Page 78	Page 80
<p>1 turning the engine on.</p> <p>2 Q. So I want to go back a few because I want to 3 mark for the record when Ty'rique Riley is taken out 4 of the vehicle so that we know, because we're going to 5 see other videos without the audio. I want to kind of 6 make a record of how long we're able to still hear the 7 audio. So I'm going to back this up just a little bit 8 to where the door closes. So I'm backing this up to 9 the 12:13 mark on the video and then I'll pause it 10 again when the door closes just to mark that for the 11 record.</p> <p>12 Do you agree that we heard the door 13 close in your vehicle at the 12:40 mark?</p> <p>14 A. Yes.</p> <p>15 Q. I'm going to play it from there from the 16 12:40 mark.</p> <p>17 Corporal Haines, at that point I 18 think I just heard someone mention shackles. Do you 19 recognize that as your voice? Do you think that was 20 you talking?</p> <p>21 A. I believe that was me as we talked earlier. I 22 was asking the female guard if she wanted the 23 shackles.</p> <p>24 Q. So you believe at this time you're in the 25 booking center?</p>	<p>1 A. You mean of no audio?</p> <p>2 Q. Of audio. We started, remember the door 3 slammed at the 12:40 mark?</p> <p>4 A. Yes.</p> <p>5 Q. We heard audio until the 15:30 mark. So that 6 gives us almost three minutes, 2 machines and 50 7 seconds of audio that we're able to hear on your audio 8 mic even though we can't see video that matches with 9 it?</p> <p>10 A. Correct.</p> <p>11 Q. I'm now going to go to the video at the 12 booking center. And just for the record, these are all 13 videos that I received from, I believe I received them 14 all from defendants but believe all of them from your 15 counsel. And I'm sorry if I'm mistaken, but these are 16 all videos that were obtained from the defendants.</p> <p>17 So we have a still shot here. Do you 18 recognize this scene.</p> <p>19 A. Yes. That's the sally port, the booking 20 center.</p> <p>21 Q. I'm going to start playing the video there. 22 I'm going to pause it at time 55 second mark. Do you 23 recognize the vehicle that just pulled into the port?</p> <p>24 A. Yes, that was the vehicle I was driving that 25 night.</p>
Page 79	Page 81
<p>1 A. Yes.</p> <p>2 Q. I'm going to play it from there. We're now at 3 the 14:17 mark. We'll continue it playing.</p> <p>4 Corporal Haines, I thought I just 5 heard somebody say oh, no. Do you recognize that voice 6 to be Ty'rique Riley's voice?</p> <p>7 A. I don't know that I would be able to 8 recognize his voice.</p> <p>9 Q. Did you hear someone say oh, no?</p> <p>10 A. I heard something. I couldn't make it out.</p> <p>11 Q. I'll continue at 14:37. And it sounds like 12 the audio just dropped out at about the 15:30 mark; is 13 that fair?</p> <p>14 A. Yeah. I haven't heard anything for the last 15 couple of seconds.</p> <p>16 Q. And we're at 15:32. I'm not going to play the 17 rest because I'll represent that I don't believe 18 there's any other audio and it's just sitting at this 19 car until it leaves. But unless you would like to see 20 it I don't have a reason to play the rest of it.</p> <p>21 A. I don't need to see it.</p> <p>22 Q. So if the audio stopped at 15:30 and we 23 started it when the door slammed at 12:40 then we have 24 almost three minutes, we have 2 minutes and 50 seconds 25 of audio. Do you agree with that?</p>	<p>1 Q. And have you seen this video before?</p> <p>2 A. Just this morning.</p> <p>3 Q. Is that the only time you've seen it?</p> <p>4 A. Yes.</p> <p>5 Q. I'm going to continue playing. And I lied. 6 I'm going to stop it for a second. When you viewed it 7 did it have any audio?</p> <p>8 A. No. I don't believe it did.</p> <p>9 Q. I'm going to start it again at 58 seconds. So 10 we saw Ty'rique Riley being removed from your vehicle 11 and we saw the doors of your vehicle being closed and 12 we're now at the at 1:30 mark; is that correct?</p> <p>13 A. That is correct.</p> <p>14 Q. I'm going to start the video from there. I'm 15 going to pause it at the 2:07 mark because now you 16 have followed the other officers and Ty'rique Riley 17 into a doorway; is that correct?</p> <p>18 A. That is correct.</p> <p>19 Q. I'm going to stop this video here. You've 20 seen it before. There's no other video with you and 21 Ty'rique Riley in this video so I'm going to move to 22 another video. Can you see that video?</p> <p>23 A. I can, yes.</p> <p>24 Q. I'm going to start playing. Corporal Haines, 25 do you recognize this area?</p>

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22 (Pages 82 to 85)

<p style="text-align: right;">Page 82</p> <p>1 A. Yes. I said earlier there were two doors that 2 we need to go through to get into the actual booking 3 center. This is the view from in the first door going 4 into the second door.</p> <p>5 Q. At the 40 second mark do you recognize those 6 as the officers that were coming out to meet you when 7 you pulled up into the port?</p> <p>8 A. That appears to be the same three, yes.</p> <p>9 Q. And again, you don't know who any of those 10 officers are; is that correct?</p> <p>11 A. No, I do not know them.</p> <p>12 Q. I'm going to fast forward just a few seconds 13 just to help us save some time to the 2 minute mark. 14 What are we seeing here?</p> <p>15 A. It looks like they're escorting Mr. Riley in 16 and I'm closing the door. And Mr. Riley is resisting.</p> <p>17 Q. I'm going to stop the video there at the 2:28 18 mark. Do you see this video?</p> <p>19 A. Yes. That looks like inside of the booking 20 center at the door, the second door that we would have 21 had to come through.</p> <p>22 Q. I'm going to start playing that video and I'm 23 going to fast forward just to save us some time to the 24 1:55 mark. Please tell us what you see there.</p> <p>25 A. Mr. Riley is still resisting. The three</p>	<p style="text-align: right;">Page 84</p> <p>1 manipulating the screen and lose it.</p> <p>2 MR. ROSS: He's saying he cannot see 3 himself in the frame and I can see him so I wanted him 4 to try and --</p> <p>5 MR. MACMAIN: Is that your legs on 6 the far right hand corner of the screen? Do you think 7 that's your pant legs?</p> <p>8 A. I can't see myself at all right now. And 9 that's because I'm there and then Mr. Norfleet.</p> <p>10 MR. ROSS: Yeah. I think it's just a 11 matter of how he has his pictures oriented not about 12 the video.</p> <p>13 MR. MACMAIN: I can see his legs on 14 the far right hand side. It's right where all he has 15 on his right hand side all his camera views. His 16 screen is not as big as mine.</p> <p>17 Q. If you have a recollection of being their, 18 Corporal Haines, that's fine. I just wanted to let you 19 know how close you were to everyone.</p> <p>20 A. If it helps yes. I recall being to the right. 21 I see myself now and then walking over and it looks 22 like grabbing the shackles.</p> <p>23 Q. I'm going to pause here at the 1:06 mark. Do 24 you believe that that was the time that he had the 25 exchange where you had mentioned the shackles and then</p>
<p style="text-align: right;">Page 83</p> <p>1 officers escort him in and I come behind.</p> <p>2 Q. So now you're actually inside the booking 3 center; is that correct?</p> <p>4 A. That is correct.</p> <p>5 Q. I'm going to stop it there at the 2:32 mark, 6 go to another video. Do you see that video?</p> <p>7 A. Yes. It looks like the overall view of the 8 booking center.</p> <p>9 Q. I'm going to start it there. We're at the 23 10 second mark. Can you tell me what you're seeing?</p> <p>11 A. At the bottom of the scene it looks like Mr. 12 Riley is still resisting, the three guards are holding 13 him and maybe they're trying to search him. And then 14 I see a 4th guard come from the desk area, the female 15 officer and she puts her gloves on. I don't see myself 16 in the picture at all yet.</p> <p>17 Q. You cannot see yourself there?</p> <p>18 A. No. I cannot but I'm missing a little bit of 19 the screen with everybody else's face on the screen.</p> <p>20 Q. Can you minimize the faces. If they're on the 21 right hand side and there's like four squares you can 22 go to the top of it and make it one or you can move 23 the squares around.</p> <p>24 MR. MACMAIN: What is it we're trying 25 to do? Maybe he can answer your question without</p>	<p style="text-align: right;">Page 85</p> <p>1 retrieved them that we heard on the audio?</p> <p>2 A. That is correct.</p> <p>3 Q. I'm going to pause it right there at the 1:42 4 mark. Corporal Haines, at that point you assisted with 5 the removal of shoes of Mr. Riley and the leg 6 shackling; is that correct?</p> <p>7 A. That is correct.</p> <p>8 Q. Do you as you're looking at the video can you 9 observe one gentleman with his knee on the neck of 10 Ty'rique Riley?</p> <p>11 MR. MACMAIN: I'm going to object to 12 the form.</p> <p>13 Q. You can answer. What I'm asking is whether or 14 not you see that on the video?</p> <p>15 A. It appears that the gentleman that's on my 16 screen in the blue shirt on the left it does appear 17 that there is a knee there in that general area, yes.</p> <p>18 Q. What I'll do is, the first question is, do 19 you recall seeing the gentleman placing his knee on 20 the neck of Ty'rique Riley during this time?</p> <p>21 A. No, sir.</p> <p>22 Q. At any point during while you were in the 23 booking center do you recall seeing that?</p> <p>24 A. No, I do not.</p> <p>25 Q. I'm going to play it and if at any point you</p>

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23 (Pages 86 to 89)

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1 don't agree with my representation that the gentleman
 2 has his knee on Ty'rique Riley's neck will you let me
 3 know, please?

4 **A. Yes, sir.**

5 Q. I'm going to back it up just a little bit
 6 just so we don't start from that point. So I'm
 7 starting from 1:22. At the 1:29 mark is when I saw the
 8 knee go onto the neck. Do you agree with that?

9 **A. I see the knee in that area, yes, sir.**

10 Q. I'll continue from 1:30. I'm going to pause
 11 it at the 1:33 mark. Is this when your assistance with
 12 regard to go leg shackles, you're no longer assisting
 13 the officers with the leg shackles; is that fair to
 14 say?

15 **A. That is correct.**

16 Q. Are you authorized to assist these officers
 17 in doing things like putting on leg shackles? I guess
 18 my question is, it's not against the rules for you to
 19 do what you did; is that correct?

20 **A. No. Again it's their house. I would always
 21 ask before I do anything.**

22 MR. NORFLEET: I'm sorry, Riley. You
 23 guys are going into questions and answers pretty
 24 quick. I just want to put an objection to form on that
 25 last question.

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1 **A. So there's nothing that prohibits me from
 2 assisting if they ask or if I see an immediate need.**

3 Q. So even if you don't, even if not asked
 4 there's nothing that prohibits you from getting
 5 involved if you see a need to do that; is that
 6 correct?

7 **A. If I see an immediate need yes, I would
 8 assist.**

9 Q. I'm going to continue from 2:33. I'm at the
 10 3:32 mark. And were you able to see yourself, Corporal
 11 Haines?

12 **A. Yes. I believe I saw the handcuffs were
 13 taken off and they were handed back to me. I believe
 14 that's what I saw.**

15 Q. I'm going to backup just a second. I'm at the
 16 3:27 mark. I don't know if you can see your right side
 17 of the screen but it looked to me like you handed the
 18 female correction officer a set of handcuffs?

19 **A. Yeah. I did see that, yes, that time.**

20 Q. And again this is you assisting the officers,
 21 correct?

22 **A. I would assume that they asked for the
 23 handcuffs so yes, I gave it to them.**

24 Q. And there's nothing that prohibits you from
 25 them the handcuffs or otherwise assisting them,

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1 correct?

2 **A. No.**

3 MR. NORFLEET: Objection to form.

4 Q. I'm starting at the 3:33 mark. I'm stopping
 5 at 4:27. Did you witness your involvement there at
 6 all, Corporal Haines?

7 **A. I believe that is when they hand me my
 8 handcuffs back.**

9 Q. It looked to me like they put the handcuffs
 10 on him and then removed your handcuffs to give them
 11 back to you. Is that fair to say?

12 **A. Yes. There's was placed on and mine was
 13 removed.**

14 Q. Okay. I'm going to start it at 4:27. I'm
 15 pausing at 4:41. At this point it looks like Mr.
 16 Riley is taken into a room. Do you know if that's a
 17 cell or if it's just a room?

18 **A. I believe it's a cell but I can't say 100
 19 percent sure.**

20 Q. Okay. That's fine.

21 **A. I know the medical office is right in that
 22 corner and I'm not sure which door it is.**

23 Q. Okay. I'm going to start at 4:41. And I'm
 24 going to stop it at 5:14. I don't know if you can see
 25 yourself again on the right hand side but it appeared

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1 that you were coughing a few times. The female
 2 security guard also came out and it appeared that she
 3 was coughing. Do you recall coughing at all in the
 4 booking center?

5 **A. I do. Yes.**

6 Q. And do you know what caused that coughing?

7 **A. There was OC sprayed.**

8 Q. Do you recall, I don't recall seeing the OC
 9 sprayed on the video. Do you recall seeing it being
 10 sprayed at any point?

11 **A. I thought, again, I don't know what time or
 12 point but I thought it was when Mr. Riley was laying
 13 straight across the screen is when it was sprayed.**

14 Q. Okay. And I'll go back and see that. I must
 15 have missed that. But by this time that he was in this
 16 either room or cell the OC spray had already occurred;
 17 is that your recollection?

18 **A. That is correct.**

19 Q. I'm going to start at 5:14. I'm pausing at
 20 6:06. Right now it looks like I see at least four,
 21 possibly five correctional officers outside of or
 22 around the entryway to either the room or the cell. Do
 23 you know what's being discussed at this time, Corporal
 24 Haines, by those officers?

25 **A. I don't recall. I don't know what they were**

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24 (Pages 90 to 93)

<p style="text-align: right;">Page 90</p> <p>1 discussing.</p> <p>2 Q. Do you recall hearing Ty'rique Riley saying 3 anything at this time?</p> <p>4 A. No. I don't recall.</p> <p>5 Q. I'll continue the video from there. I'm 6 stopping at 6:29. It looks like someone walked in from 7 the left hand side of the screen. Do you recall seeing 8 someone else come into, go into that room or the cell?</p> <p>9 A. Yes. So as I explained earlier, that corner 10 is I'm going to call it the nurse's office and that 11 appeared to be the nurse to me. Normally they wear 12 hospital scrubs.</p> <p>13 Q. Do you recall the nurse coming in at some 14 point while you were there at the booking center?</p> <p>15 A. Yes.</p> <p>16 Q. What happened when she came in?</p> <p>17 A. I remember her going into the room. Again, I 18 kept my distance. I don't know what was said or 19 wasn't said.</p> <p>20 Q. I'm going to play it from there from 6:29. 21 The video stops there shortly after what I saw as the 22 nurse leaving the room and the officers coming out 23 going back to the desk near where you were standing. 24 Do you recall anything happening after that video 25 stopped with any of the officers?</p>	<p style="text-align: right;">Page 92</p> <p>1 looking at now was drafted on January 10, 2022?</p> <p>2 A. That is correct.</p> <p>3 Q. Can you explain why in January of 2022 this 4 report was drafted?</p> <p>5 A. So when I knew this deposition was coming I 6 started to review the reports and the video that we 7 had inhouse. And I could not find my supplemental 8 report. I spoke with my administration and I told them 9 I remember doing a report. It was actually a 10 directive. And to be honest it could not be located 11 and that's why it's dated 1/10 of '22 and back when 12 this incident happened.</p> <p>13 Q. So as I understand it you were directed to do 14 a report when the incident occurred; is that correct?</p> <p>15 A. Soon thereafter. I can't give you a date.</p> <p>16 Q. But you said it was a directive meaning you 17 were ordered to do it as opposed to you just decided 18 hey, this is something that I'm going to do; is that 19 right?</p> <p>20 A. Yes.</p> <p>21 Q. And that you recall doing that report at that 22 time?</p> <p>23 A. I do.</p> <p>24 Q. But it could not be located, right?</p> <p>25 A. That is correct.</p>
<p style="text-align: right;">Page 91</p> <p>1 A. No. I believe one of them soon thereafter 2 said I was released and I left.</p> <p>3 Q. Did you have any further interactions at all 4 with Ty'rique Riley?</p> <p>5 A. No, sir.</p> <p>6 Q. I'm going to show you a document.</p> <p>7 MR. MACMAIN: Riley, if we can get a 8 short break. We've been going for a while.</p> <p>9 MR. ROSS: I actually may be done in 10 the next two or three minutes.</p> <p>11 MR. Macmain: Okay. I don't know if 12 other people have questions.</p> <p>13 MR. ROSS: Why don't I finish up and 14 then if people have questions we can take a break. And 15 if not we'll be done.</p> <p>16 BY MR. ROSS:</p> <p>17 Q. Do you see the document on the screen, 18 Corporal Haines?</p> <p>19 A. Yes.</p> <p>20 Q. What is this document? If you know.</p> <p>21 A. Sure. This is my supplemental that I 22 completed about this incident.</p> <p>23 Q. I see that it's assigned on January 10, 2022 24 and it's approved on January 20, 2022. Does that mean 25 that this report was drafted on, this report we're</p>	<p style="text-align: right;">Page 93</p> <p>1 Q. I just want to know, is there anything in 2 this report that you disagree with?</p> <p>3 A. No. I wrote it. I mean, it goes along with 4 the videos and everything else that was said today.</p> <p>5 Q. And you wrote this report in connection with 6 reviewing other reports and videos of the incident in 7 January 2022?</p> <p>8 A. So I remembered this incident vividly. For 9 the most part this came directly from my recollection.</p> <p>10 Q. Is there anything about this incident that 11 caused you to remember it vividly individually?</p> <p>12 A. Sure. It's my first lawsuit in 21 years. It's 13 amazing how you remember stuff when you get sued.</p> <p>14 Q. Okay. Was there anything else, anything 15 significant about this incident at the time that stood 16 out?</p> <p>17 A. Absolutely not. To be honest if there wasn't 18 a lawsuit I would not be recollecting this.</p> <p>19 Q. Was there ever any investigation conducted 20 within the Susquehanna Police Department related to 21 the arrest of Ty'rique Riley that you're aware?</p> <p>22 A. So it was not within the Susquehanna Township 23 Police Department. It was reviewed by the Dauphin 24 County District Attorney's Office which overseas us.</p> <p>25 Q. And tell me about that review.</p>

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25 (Pages 94 to 97)

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<p>1 A. My part of the review was that I spoke with 2 one of detectives and I gave him an account of what I 3 did that day.</p> <p>4 Q. Do you recall when you spoke to this 5 detective?</p> <p>6 A. It was after the death of Mr. Riley.</p> <p>7 Q. Do you recall if it was within weeks of his 8 death, months of his death?</p> <p>9 A. Weeks to months. I couldn't give you a date.</p> <p>10 Q. Did you have any other involvement in the 11 review by the District Attorney's Office?</p> <p>12 A. No, sir.</p> <p>13 Q. Were you given any reports of the conclusion 14 of the investigation by the District Attorney's 15 Office?</p> <p>16 A. No. I was not.</p> <p>17 Q. Were you provided any documents in connection 18 with the review by the District Attorney's Office?</p> <p>19 A. No.</p> <p>20 Q. Any other investigations or reviews relating 21 to the incident involving Ty'rique Riley that you're 22 aware of?</p> <p>23 A. No.</p> <p>24 MR. ROSS: Let me take this down. I 25 would like to consult with my partner so why don't we</p>	<p>1 MR. YODER: Nothing from me at this 2 time, thanks.</p> <p>3 BY MR. MacMAIN:</p> <p>4 Q. So I just want to ask you a few. Corporal 5 Haines, one of the pieces of information or one of the 6 things you suspected was that Mr. Riley may be under 7 the influence of drugs or alcohol, correct?</p> <p>8 A. That is correct.</p> <p>9 Q. Can you give me a percentage of how many 10 people you arrest and transport to prison that you 11 suspect are under the influence of drugs or alcohol?</p> <p>12 A. Sure. I would say a high percent, probably 13 50 percent or more.</p> <p>14 Q. You were asked about some concern or 15 suspicion that Mr. Riley may have some kind of mental 16 challenge or mental illness. The same question. A 17 percentage of people that you deal with in your line 18 of work and/or transport to the prison. Can you give 19 us percentage of how many people you have some 20 suspicion.</p> <p>21 A. I would say it's another high amount. Not as 22 much as intoxicated but 30 to 40 percent.</p> <p>23 Q. The other information you had is that Mr. 24 Riley was being arrested pursuant to an incident of 25 domestic violence. Percentage of people you arrest</p>
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<p>1 take a couple of minutes to do that and if anyone has 2 questions when we back we can address them and see 3 where we are; is that all right?</p> <p>4 MR. NORFLEET: Yes.</p> <p>5 MR. ROSS: It's about 1:26. Do you 6 want to come back at 1:30 or do we need a little 7 longer?</p> <p>8 MR. MACMAIN: Probably more than five 9 minutes.</p> <p>10 MR. ROSS: Okay. Five to ten minutes 11 we'll come back.</p> <p>12 (Recess taken.)</p> <p>13 MR. ROSS: The plaintiffs, we're all 14 done. So I'll turn it over to the defendants if they 15 have any questions.</p> <p>16 MR. MACMAIN: Anybody else have 17 questions? I have some but I figured I would go last.</p> <p>18 MR. NORFLEET: This is Andy Norfleet. 19 Unless I have a follow-up to something that someone 20 else asks I don't have any questions at this point.</p> <p>21 MR. CARMELITE: On behalf of Swanson 22 I don't have any questions unless further questions 23 from Mr. MacMain trigger that need.</p> <p>24 MR. MacMAIN:: Mr. Yoder, any 25 questions you have?</p>	<p>1 that are involved in some type of domestic violence 2 incident?</p> <p>3 A. Easily another 50 percent I'm thinking.</p> <p>4 Q. And there was nothing at any point in your 5 observations or anything that was told you that you 6 thought that Mr. Riley needed immediate medical or 7 mental health attention at a facility other than the 8 correctional facility you took him to?</p> <p>9 A. That is correct.</p> <p>10 Q. You were asked some questions about what 11 specific list of questions and information medical 12 staff at Dauphin County Booking Center asks arrestees. 13 And my question to you is, are you present when those 14 questions are asked or is that something that's done 15 outside of your presence?</p> <p>16 A. It's normally done outside of my earshot.</p> <p>17 Q. So all you're told is they're cleared, they 18 can be admitted or no they're not cleared, you have to 19 take them somewhere else?</p> <p>20 A. I'm just looking for the yes or the no.</p> <p>21 Q. And in this instance you were told that Mr. 22 Riley had been cleared by medical professionals to be 23 admitted to Dauphin County Prison?</p> <p>24 A. That is correct.</p> <p>25 Q. You were asked some questions on the video,</p>

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26 (Pages 98 to 101)

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1 specifically at one point Attorney Ross had indicated
 2 that he was observing one of the corrections officers
 3 with his knee in the area of Mr. Riley's head or neck.
 4 Do you recall those questions?

5 A. **I do.**

6 Q. During the time that was happening did you
 7 observe that?

8 A. **I did not.**

9 Q. And, in fact, if I looked at the video there
 10 was actually corrections officers between you and the
 11 top of Mr. Riley's head and neck area; is that
 12 correct?

13 A. **That's correct. I was at the very tail end
 14 at his feet.**

15 Q. And if I recall from the video you were
 16 actually engaged in trying to put leg shackles on Mr.
 17 Riley's ankles during that same time period?

18 A. **That is correct.**

19 Q. During the time that you were in the booking
 20 center and force was being used in an attempt to try
 21 to secure Mr. Riley was there anything that you saw as
 22 a police officer that you thought would be considered
 23 unnecessary or excessive force?

24 A. **I did not see any excessive force.**

25 Q. Did you see any reason or anything you

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1 **there is something in place now. I don't know if it
 2 was before this incident or after this incident.**
 3 Q. And what is in place now as you remember it?
 4 A. **A knee is not supposed to be in somebody's
 5 neck.**

6 MR. ROSS: Thank you. That's all I
 7 have and thank you for your time today.

8 MR. NORFLEET: I have a couple
 9 follow-up.

10 BY MR. NORFLEET:

11 Q. Corporal Haines, I just have a couple and it
 12 will end my portion of your deposition. You had
 13 mentioned that at some point custody is transferred
 14 from you as the arresting officer to the booking
 15 center; is that correct?

16 A. **That is correct.**

17 Q. Start generally with me. At what point
 18 generally does that custody transfer from the
 19 arresting officer to the folks at the booking center?

20 A. **I think it's very -- I think I can state
 21 something very clear. It's more or less when the
 22 supervisor of the booking center I am free to go and
 23 that is after the medical clearance. I know I am
 24 personally not allowed to leave until they are
 25 medically cleared.**

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1 observed that would cause you to intervene and step in
 2 and take some kind of action?

3 A. **There was nothing I saw that would cause me
 4 to do that.**

5 Q. One other question. During transport, one of
 6 things that Mr. Riley says quite a bit is I didn't do
 7 it. Percentage of people that you transport to the
 8 prison that say those kind of things to you as an
 9 officer?

10 A. **Very very high.**

11 MR. ROSS: I'm going to object to the
 12 form of the question. You can answer.

13 Q. So nothing unusual about someone saying I
 14 didn't do it when they're being transported to the
 15 prison?

16 A. **That's correct.**

17 MR. MacMAIN: Okay. That's all the
 18 questions I had.

19 BY MR. ROSS:

20 Q. Corporal Haines, quick question. At the time
 21 of the incident did the Susquehanna Police Department
 22 have any prohibitions to officers being able to place
 23 their knee on a suspect's neck in order to detain
 24 them?

25 A. **I believe, I can't give you an exact date but**

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1 Q. And so and I appreciate that answer. So
 2 based on that answer Mr. Riley was in your custody
 3 until you were cleared and then told that you can go?
 4 MR. MacMAIN: Objection to form. You
 5 can answer it.

6 A. **Do I assume some responsibility I guess. I
 7 guess when we walking into the booking center I would
 8 say it is the guard's responsibility because it's
 9 their house. When the guards do their process I would
 10 say the person is in their custody. I am also I'm
 11 going to use quotations in the guard's custody and I
 12 am not released until the guards say that I am free to
 13 go.**

14 Q. So when you entered the sally port and Mr.
 15 Riley was in your vehicle was Mr. Riley in your
 16 custody at that point?

17 A. **I would say once he was removed from my
 18 vehicle I think it would have been transferred over to
 19 the correction officers.**

20 Q. So let me back up. So when you arrived at the
 21 booking center and before you roll down your window
 22 and hit the button to talk to anyone Mr. Riley is in
 23 your custody; is that correct?

24 A. **That is correct.**

25 Q. And when you hit the button and told them

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27 (Pages 102 to 105)

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1 that Mr. Riley was in the back and was moving around
 2 he was in your custody, correct?

3 **A. That is correct.**

4 Q. And prior to your pulling into the gate which
 5 we saw on the video Mr. Riley was in your custody,
 6 correct?

7 **A. Correct.**

8 Q. And as he was sitting in your vehicle and you
 9 were waiting for the guards to come out he was in your
 10 custody, correct?

11 **A. That is correct.**

12 Q. And then is it your testimony that as soon as
 13 the guards enter the sally port that that's when your
 14 custody ends?

15 **A. I'm going to go with it as a shared custody
 16 at that point.**

17 Q. And when do you believe the shared custody
 18 ends?

19 **A. The shared custody is when I am told by the
 20 guard that the defendant is, they're taking custody,
 21 I'm released and I am free to go. If they were not
 22 taking full responsibility for the defendant I would
 23 not be free to go.**

24 MR. NORFLEET: Okay. Thank you.

25 That's all.

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1 **BY MR. NORFLEET:**

2 Q. Sure. You had testified that you believed
 3 that there was a shared custody between you and the
 4 folks at the booking center and you believed that the
 5 shared custody terminated when a supervisor or someone
 6 told you you're released, you can go. And I just want
 7 to make sure that I understand that correctly.

8 **A. Sure. Because if Mr. Riley or any other
 9 defendant that I take to the booking if the prison
 10 would not accept them they would give the custody back
 11 to me and I would have to leave with the defendant and
 12 get them cleared of the prison.**

13 **Why I'm saying it's shared is like I
 14 have maybe the expectation that custody might come
 15 back to me that I might have to leave with him, Again,
 16 I referred to it many times. It's Dauphin County's
 17 prison. It's not Corporal Haines' prison. So that's
 18 why I'm saying until I am officially released. That's
 19 why I am using the word shared custody.**

20 Q. Sure.

21 **A. It's more or less if I give you something
 22 it's not until you officially accept it maybe that
 23 it's yours.**

24 Q. Okay. And you've testified a number of times
 25 and you were very clear on this, that at no point

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1 MR. ROSS: Can I ask for a
 2 clarification on that last answer.

3 **BY MR. ROSS:**

4 Q. Corporal Haines, were you saying in general
 5 or were you saying specifically for what we saw on the
 6 video?

7 **A. You have to give me more specifics about
 8 your -- what are you getting at there?**

9 Q. I thought Andy was asking you when did the
 10 shared custody end for Ty'riqe Riley but your answer
 11 sounded like you were saying more in a general sense
 12 of when shared custody ends so I'm just trying to --

13 **A. I would think it would be, for Mr. Riley the
 14 custody going 100 percent to Dauphin County is when I
 15 was released.**

16 MR. NORFLEET: And prior to that
 17 that's what you're describing as shared custody?

18 MR. MacMAIN: Hold on a second. Let
 19 me renew my objection. It seems to me, he can answer
 20 the questions factually, but it seems to me that we
 21 lawyers are talking perhaps about a different custody
 22 than what the officer is qualified to testify to. But
 23 I'll let him answer the question with that objection.

24 MR. NORFLEET: Understood. Thank you.

25 **A. So ask the question one more time, please.**

1 during your interaction with Ty'riqe Riley did you
 2 believe he needed to be transported to a hospital,
 3 correct?

4 **A. That is one hundred percent sure.**

5 Q. And after you rang the bell at the booking
 6 center if you believed Ty'riqe Riley needed to go to
 7 the hospital you could have taken him at that point,
 8 correct?

9 **A. If I would have needed to, yes.**

10 MR. NORFLEET: All right. That's all
 11 I have.

12 MR. MacMAIN: Anyone else? Okay. The
 13 deposition is adjourned.

14 (Witness excused.)

15 (Deposition concluded 1:52 P.M.)

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1 C E R T I F I C A T I O N
2
3

4 I hereby certify that the proceedings,
5 evidence and objections noted, are contained fully and
6 accurately in the notes taken by me on the hearing of
7 this matter, and that this copy is a correct
8 transcript of the same.
9

10

11

12

13 NICHOLAS DiPIERO, R.P.R.
14 Registered Professional Reporter
15 Notary Public
16
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19 transcript does not apply to any reproduction of the
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21 and/or supervision of the certifying reporter.)
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25

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